



PUBLIC CONSULTATION ON THE SWOT ANALYSIS FOR THE CAP STRATEGIC PLAN – RESPONSE FORM

Consultation Questionnaire

The Department of Agriculture, Food and the Marine seeks the views of the public on the SWOT analysis for the CAP Strategic Plan. This form should be used when submitted a response.

Terms and Conditions

All submissions, including the name of the person making the submission, will be published on the Department's website.

Freedom of Information

In the interest of transparency, DAFM intends to publish all submissions received in response to this consultation and the identity of the party making the submission, including their affiliation on the DAFM website. Any submission containing confidential, private or commercially sensitive information or material should therefore be clearly identified and specify the reasons for its sensitivity. All submissions received will be subject to the provisions of the Freedom of Information (FOI) Act 2014 and may be released or published on foot of third party applications or otherwise.

By responding to the consultation, respondents consent to their name and affiliation being published online with the submission. The Department will redact all other personal data prior to publication.

Data Protection

Please note that if you make a submission you are agreeing for it to be published in accordance with the EU General Data Protection Regulation (GDPR EU 2016/679), the Data Protection Acts 1988-2018, the Freedom of Information Act 2014 and the DPER Consultation Principles and Guidance.

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RESPONSE FORM

Details:

Full Name: **Breian Carroll – General Secretary ACA**

Organisation where applicable: **Agricultural Consultants Association (ACA)**

Please tick one of the following options that best describes you;

Farmer (full-time)	<input type="checkbox"/>	Farmer (part-time)	<input type="checkbox"/>	Farm family member	<input type="checkbox"/>
Member of the public	<input type="checkbox"/>	Other	<input checked="" type="checkbox"/>		

Are you involved in;

Agriculture	<input checked="" type="checkbox"/>	Forestry	<input checked="" type="checkbox"/>	Farm Organisation	<input type="checkbox"/>
Rural Development	<input checked="" type="checkbox"/>	Food industry	<input type="checkbox"/>	Environment	<input checked="" type="checkbox"/>
Community Sector	<input type="checkbox"/>	Research	<input type="checkbox"/>	Civil Society / NGO	<input type="checkbox"/>

Other: _____

Nine specific objectives of the Common Agriculture Policy post 2020

1. support viable farm income and resilience across the Union to enhance food security;
2. enhance market orientation and increase competitiveness, including greater focus on research, technology and digitalisation;
3. improve the farmers' position in the value chain;
4. contribute to climate change mitigation and adaptation, as well as sustainable energy;
5. foster sustainable development and efficient management of natural resources such as water, soil and air;
6. contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes;
7. attract young farmers and facilitate business development in rural areas;
8. promote employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry;
9. improve the response of EU agriculture to societal demands on food and health, including safe, nutritious and sustainable food, food waste, as well as animal welfare.

Those objectives shall be complemented by the cross-cutting objective of modernising the sector by fostering and sharing of knowledge, innovation and digitalisation in agriculture and rural areas.

SWOT template

Objective - 1 support viable farm income and resilience across the Union to enhance food security;	
<p>Strength</p> <p>S1 Agriculture provides significant employment across many sectors of society and the broader economy relies on a successful agricultural industry in each member state</p> <p>S2 Predominantly grass based system in Ireland</p> <p>S3 Very Carbon efficient food based systems</p> <p>S4 Ireland has a huge competitive advantage over other EU and World countries in terms of water availability. This is a much less intensive problem than finding water in more arid areas.</p>	<p>Weakness</p> <p>W1 Imported goods can undermine produce from within the Union</p> <p>W2 Low profitability in most sectors</p> <p>W3 67% of Irish farmers have no direct link to state funded research as 43,000 farmers are linked to Teagasc.</p> <p>W4 Farmers are being asked to produce farm products at higher standards for a lower price which is not sustainable to encourage existing farmers or new entrants into the sector.</p>
<p>Opportunity</p> <p>O1 Have a CAP plan which can provide direction for farmers for a 10 year period as a 5-6 year period is very short for forward planning.</p> <p>O2 Increasing demand for safe and environmentally produced food</p> <p>O3 Engage and set up formal collaborative structures to ensure state funded research is disseminated to 70,000 private advisor farmer clients.</p> <p>O4 Research alternatives for beef farms for example cutting grass for anaerobic digesters where a farmer wants an alternative to rearing cattle.</p> <p>O5 Build profitability into agricultural systems or risk sharing systems between producers, intermediaries and consumers. Investment is required and the share of the market price that primary producers currently get is not sufficient to make necessary investments to build flexibility to overcome impacts of climate change.</p>	<p>Threat</p> <p>T1 A CAP budget needs to ensure that funding is targeted towards farmers with an economic and social benefit.</p> <p>T2 Costs of compliance in EU</p> <p>T3 Weather and climate causing farmers to house cattle for longer periods than in the past.</p> <p>T4 Potential for rural degeneration due to poor income support and extensive farm systems.</p> <p>T5 Reliance on imports to feed the population is too risky in the long term. Focus must be on becoming more self-sufficient on major foodstuffs like milling wheat, potatoes and fruit and vegetables.</p> <p>T6 Reduction in CAP budget. Farmers being asked to do for less.</p>

Objective 2 - enhance market orientation and increase competitiveness, including greater focus on research, technology and digitalisation;

<p>Strength</p> <p>S1 Agri sector stakeholders – farmers, advisors, co-ops, state research agencies etc. are categorised within the EU as being of a high quality.</p> <p>S2 Reputation of our Quality assurance schemes</p> <p>S3 Highly educated farmer workforce compared to other developing economies open to new ideas and change.</p> <p>S4 Excellent traceability chain where food origin can be identified and validated</p>	<p>Weakness</p> <p>W1 67% of Irish farmers have no direct link to state funded research as 43,000 farmers are linked to Teagasc.</p> <p>W2 Data centralised capture on farms could be improved greatly, particularly in animal drafting systems where cattle and sheep weights should be recorded more frequently when animal husbandry tasks are being completed.</p> <p>W3 Brexit and overreliance on UK</p> <p>W3 : Potential to use Blockchain Technology to gain consumer confidence in farm to fork</p>
<p>Opportunity</p> <p>O1 Advisors to be funded to set up cluster groups of farmers with a host farmer who is willing to be an early adopter of new technologies and his fellow farmers can see the effects of these adoptions and implement them on their own farms. In conjunction with the host farmer model where 6 walks take place per year, the advisor visits the individual farmers in the group twice a year to encourage adoption to these new technologies.</p> <p>O2 Explore further markets for value added products as over reliance on English markets have been exposed</p> <p>O3 Increasing demand for safe and environmentally produced food</p> <p>O4 Teagasc has access to significant supported world class state research which they should disseminate to all Irish farmers.</p> <p>O5 Potential to create a food product with low carbon to meet market demands.</p> <p>O6 Accuracy in the application of fertilisers through correct calibration of machinery and the training of such operators</p> <p>O7 LADAR technology to be funded to create information to identify and quantify landscape features</p>	<p>Threat</p> <p>T1 Too much price variance for farmers yet consumers are still paying top prices for their goods.</p> <p>T2 Costs of compliance in EU</p> <p>T3 Climate Action measures will mean additional implementation costs on farms.</p> <p>T4 55% of farmers are over 60 years of age – risk of being laggards in adapting new technologies.</p> <p>T5 Excluding private advisors in national policy on IT developed advisory systems will have an adverse effect on the integration of digitalisation and modernisation of the CAP</p> <p>T5 No joined up thinking or structured collaboration by all stakeholders’ e.g. private and public advisors with support from the DAFM and government agencies on the delivery of sectoral targets.</p> <p>T6 ACA are best placed as a conduit for dissemination and structure in the private farm advisory sector (74% of private sector advisors are members of ACA) Unsupported, private advisors will remain as solo operators which will have negative impacts on the sector and policy objectives.</p>

Objective - 3 improve the farmers' position in the value chain;	
<p>Strength</p> <p>S1 Quality assured scheme is currently in place</p> <p>S2 Sustainable Quality assurance schemes</p>	<p>Weakness</p> <p>W1 Market prices do not represent consumer prices particularly in the sheep meat sector where prices can be almost €2 per kilo in variance from €6.60 /kg paid for Spring lamb in 2019 to €4.60 /kg in September 2019</p> <p>W2 Share of added value reducing for primary producer</p> <p>W3 Lack of producer groups in the most vulnerable sectors such as beef and sheep</p>
<p>Opportunity</p> <p>O1 Use social media and powerful influencers/bloggers to spread a fact based campaign of the benefits of a healthy diet containing Dairy/red meat.</p> <p>O2 Growing demand for 'natural' based food production systems provides opportunities for premiumisation by primary producers</p> <p>O3 Huge potential to develop low carbon high nature added value beef and lamb market.</p> <p>O4 Train farmers to achieve targets by using best practice management and adopt best available technology and research to produce a low carbon product e.g. the MACC and achieve value added products.</p>	<p>Threat</p> <p>T1 In a fast paced society ready prepped food or easy to cook meals mainly chicken based are much more common than traditional meat and veg dinners.</p> <p>T2 Market volatility, price variations and input costs</p> <p>T3 Lack of knowledge and understanding of the objectives.</p> <p>T4 ACA are best placed as a conduit for dissemination and structure in the private farm advisory sector (74% of private sector advisors are members of ACA) Unsupported, private advisors will remain as solo operators which will have negative impacts on the sector and policy objectives.</p>

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

<p>Strength</p> <p>S1 Grass based systems on many farms could be further enhanced with the improvement of soil fertility as many farms are performing hugely below their potential.</p> <p>S2 Farm Advisory System which can quickly disseminate new innovations and knowledge transfer</p> <p>S3 Majority of Irish farmers are committed have proven record at adapting to new challenges</p>	<p>Weakness</p> <p>W1 Currently all farms are observed on gross carbon emitted rather than net carbon as grassland and woodland sequestration is overlooked.</p> <p>W2 Dairy herd expansion is faster than mitigation capacity</p> <p>W3 Lack of understanding and knowledge within the majority of farmers about their expectations for climate actions.</p>
<p>Opportunity</p> <p>O1 The introduction of a CO-OP based AD plant in communities where waste silage/slurry can be disposed of and electricity returned to the National Grid.</p> <p>O2 Up-skill advisory service and engagement with stakeholders/industry</p> <p>O3 Changing adaptation methods requires an investment which must be driven by legislation changes, education and training, research dissemination and behavioural and culture changes.</p> <p>O4 Tillage farmers are beginning to adopt mitigation measures through new farm crop practices whilst dairy farmers are exploring many new options in the efficient use of water and electricity. However, there needs to be incentives through the introduction of a tariff payment for surplus electricity.</p> <p>O5 Climate change technical content needs to be simplified and presented in more concise format which can be fully understood by (a) those most affected by its content and (b) all parties challenged with implementing the action requirements.</p>	<p>Threat</p> <p>T1 Sustainable energy can only currently be accessed by a very small % of farmers</p> <p>T2 Risk of “carbon leakage” if production in Ireland declines</p> <p>T3 Lack of knowledge and understanding on the objectives of the sector.</p> <p>T4 Lack of grant aid support and incentives for cattle farmers to embrace green energy systems.</p> <p>T5 Lack of engagement with the advisory services by farmers not currently using private or public advisors (30%) which undermines government and EU policy.</p>

Objective 5 foster sustainable development and efficient management of natural resources such as water, soil and air;	
<p>Strength</p> <p>S1 Good structured advisory service across Ireland to implement new agri-environmental objectives.</p> <p>S2 High % of land under agri-environment-climate commitments</p> <p>S3 Stronger position than many EU countries in relation to soil quality</p>	<p>Weakness</p> <p>W1 Inconsistency of knowledge within advisory service due to lack of training and expectations of advisors.</p> <p>W2 Currently no base line data on many farms to determine where improvements have been made or in many cases where resources have been depleted.</p> <p>W3 Increase in livestock numbers</p>
<p>Opportunity</p> <p>O1 All farms should be enforced to have a mandatory nutrient management plan where soil fertility and water quality can be monitored on a bi annual basis.</p> <p>O2 Alignment and structured collaborations with Biodiversity Ireland, NPWS, Birdwatch Ireland and Environmental NGOs to share and train farm consultants/advisors with sustainable management practices.</p> <p>O3 Roll-out of the Agricultural Sustainability Support & Advisory Programme</p> <p>O4 Require the use of GPS recording for soil sampling to ensure quality control in nutrient management planning</p> <p>O5 Require online, map-based recording of fertiliser usage as a pre-requisite of chemical fertiliser purchase. Online mapping should take weather, topography, geology, hydrology, groundwater vulnerability and agronomic management</p> <p>O6 Continuous tillage depletes soil organic matter and carbon levels and negatively impacts on soil biology. Key components for consideration:</p> <p>O7 Establish baseline measurements for nutrient status, soil biology and organic matter through laboratory analysis and new technologies</p> <p>O8 Restoration of soil organic matter through encouragement of organic manures and replacement of inorganic fertilisers.</p>	<p>Threat</p> <p>T1 Intensively stocked farms not working in tandem with best practice due to monetary gains available to them.</p> <p>T2 Slowdown in generational renewal could affect uptake of climate appropriate practices</p> <p>T3 Intensification of farming in certain areas around the country which puts pressures on our natural resources.</p>

<p>O9 Incentivise improved crop rotations legumes, brassicas, oats and cereals.</p> <p>O10 Incentivise minimum cultivation techniques and other good practice</p> <p>O11 Targeting the promotion of lime application on farms to outline its benefits to address low pH levels (as evidenced on farms nationally through latest soil reports) thus ensuring more efficient uptake of applied fertilisers.</p>	
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<p>Objective 6 - contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes</p>	
<p>Strength</p> <p>S1 Huge linear woodland habitat present in Ireland which is not currently rewarded.</p> <p>S2 An estimated 2.1 million hectares has the potential to be managed as High Nature Value farmland</p>	<p>Weakness</p> <p>W1 No continuity of schemes .REPS, AEOS and GLAS did not follow a system where habitats were rewarded</p> <p>W2 Lack of economic value attributed to public goods provided by non-productive land</p> <p>W3 Environmental schemes are too short term focussed for long term tangible results.</p>
<p>Opportunity</p> <p>O1 Provide meaningful payment under Agri-environmental schemes for the retention of existing habitats and the creation of new habitats. The creation of a new Habitat under REPS was undertaken by many farmers but once financial benefit lapsed so did the habitats.</p> <p>O2 Foster a greater understanding of environmental issues at farm level</p> <p>O3 Establish measurement techniques through remote sensing for hedgerows, identify weak hedgerows and target maintenance improvement programs</p> <p>O4 As the successful incorporation of clover in swards is dependent on optimal pH levels, introduce an awareness campaign to ensure correct application</p> <p>O5 Promote establishment of diverse pasture swards as a standard for reseeding, including legumes, herbs and multiple grass species</p> <p>O6 Introduce incentives for maintenance of existing "old-pastures" with diverse swards to reduce</p>	<p>Threat</p> <p>T1 Without monetary support farmers will overlook these habitats. This will result in land abandonment in marginal lands with Molina domination and removal of habitats in more intensively farmed areas.</p> <p>T2 Pollinators species are in decline and there is a risk of loss of species</p> <p>T3 Lack of (a) knowledge by private advisors in these areas (b) interaction of private advisors with environmental NGOs (c) training in environmental and biodiversity targets (d) inclusion of private advisors and their farmer clients in government agency projects such as the river catchment programmes etc.</p>

chemical N dependence and increase carbon sequestration in soil	
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Objective 7 attract young farmers and facilitate business development in rural areas	
<p>Strength</p> <p>S1 Off farm employment opportunities</p> <p>S2 Commitment by the DAFM in recent years to the young farmer</p> <p>S3 Majority of young farmers have at a minimum completed secondary school with many acquiring Level 6 and upwards qualification</p>	<p>Weakness</p> <p>W1 Low income in agri-sector compared to other sectors of the economy</p> <p>W2 Poor structure in place to allow for succession planning which will allow for controlled introduction of younger trained farmers into the sector.</p>
<p>Opportunity</p> <p>O1 Build on range of supports available for Young Farmers</p> <p>O2 Recalibrate the farmer training system and centres to include more night and online courses.</p> <p>O3 Reform existing young farmer syllabus of courses with practical and business modules with an emphasis on future sectoral objectives and policies of the sector</p>	<p>Threat</p> <p>T1 Income volatility in certain sectors</p> <p>T2 Lack of rural infrastructure such as broadband</p> <p>T3 No supports or incentives to encourage older farmers to retire and allow young farmers to participate and become the successor.</p> <p>T4 Many registered farm partnerships are not participating in the farm succession option which needs to be reviewed to incentivise more activity.</p> <p>T5 Review and changes in taxation policy making it less attractive to engage in farming</p>

Objective 8 - promote employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry; (See separate ACA Forestry Submission paper)

<p>Strength</p> <p>S1 Farming has underpinned the rural economy in Ireland</p> <p>S2 Project Ireland 2040 has strategic objective of Strengthened Rural Economies and Communities</p>	<p>Weakness</p> <p>W1 Rural isolation and poor services result in many younger people opting for city or town lifestyles</p> <p>W2 Lower levels of, or limited access to services including transport infrastructure compared to large urban centres</p>
<p>Opportunity</p> <p>O1 The Wild Atlantic Way has shown where targeted marketing can vastly improve tourism along the West Coast of Ireland where many farmers are now achieving spin off Agri Tourism as a result</p> <p>O2 Provision of renewable energy sources, including through community-based schemes</p> <p>O3 Incentives and education to outline benefits of bio-economy to farmers and advisors</p> <p>O4 Recalibrating the farm advisory sector by engaging and providing greater opportunities to the private sector will create additional jobs in rural areas at no cost to the exchequer.</p>	<p>Threat</p> <p>T1 The poor management and low returns of many Sitka Spruce forests on marginal ground have left many landowners sceptical of forestry.</p> <p>T2 Climate Change – economic, social and environmental impacts</p> <p>T3 Lack of baseline knowledge by farm advisors and majority of farmers on the bio-economy potential for rural areas.</p>

Objective 9 - improve the response of EU agriculture to societal demands on food and health, including safe, nutritious and sustainable food, food waste, as well as animal welfare

<p>Strength</p> <p>S1 Ireland has a positive image with Origin Green and in most instances does not require irrigation for the growth of crops</p> <p>S2 Food safety and Food Authenticity Strategy</p>	<p>Weakness</p> <p>W1 Soyabean meal is currently not sustainably produced in Ireland as is contained in a huge amount of rations to compensate for Protein.</p> <p>W2 Low level of understanding of AMR development and its transmission</p>
<p>Opportunity</p> <p>O1 Use KT based programmes focused on FEC tests, anthelmintic resistance and all animal remedies are placed on a central recording system for the vet, the farmer, DAFM and advisor to access to monitor usage</p> <p>O2 Increasing consumer demand / awareness for provenance of food vis a vis safety and health and welfare of animals</p> <p>O3 Market a sustainable beef product produced at lower volumes from reduced inputs with a primary focus on biodiversity from species rich grasslands, along the grounds of organic production</p> <p>O4 Reformed education policy on Health and Safety for Irish farms and farmers with mandatory considerations.</p> <p>O5 Evaluate the potential of part funding GLAS or other environmental actions such as LIPP and THM along with organic per hectare payments – similar models such as the PM projects.</p>	<p>Threat</p> <p>T1 Poor prices for Dairy bred calves and no export outlets may lead to huge market excess of poorer quality animals.</p> <p>T2 Increased levels of intensive farming</p> <p>T3 Action must be taken to ensure food continues to be produced in a safe and sustainable manner validated with QA schemes</p>