



## BirdWatch Ireland Submission to the SWOT analysis of the CAP post 2020 Strategic Plan

October 11<sup>th</sup> 2019

### Introduction

The SWOT analysis of the next CAP Strategic Plan is an important piece underpinning the shape of how agriculture policy will support (or not) livelihoods for farmers, healthy food for all and to minimise the impact of agriculture to birds, their habitats and other biodiversity, water quality and climate breakdown. On May 9<sup>th</sup> the Dáil declared a biodiversity and climate emergency due to increasing evidence of the limited amount of time the world has to limit global heating to 1.5 degrees of heating. At the same time globally 'Nature is declining globally at rates unprecedented in human history — and the rate of species extinctions is accelerating'<sup>1</sup>. In Ireland 70% of our European Union protected habitats are impacted by agriculture according to the most recent Article 17 report published by the National Parks and Wildlife Service<sup>2</sup>. Farmland bird populations have crashed in Ireland and have not recovered despite schemes such as GLAS (though we are hopeful that targeted measures in the EIPs will have better results). In addition, greenhouse gas emissions from agriculture are projected to increase, not decrease, according to the EPA. European Union funding for the next CAP must support agriculture that supports farmer's livelihoods that reverses the declines of biodiversity and significantly cuts absolute emissions from agriculture. The only way we are going to ensure that agriculture is on track to meet these objectives is if the assessment of needs, with the underpinning of the SWOT, is robust but we will present information to support our view that the SWOT is far from robust and needs to be reissued for consultation.

The BirdWatch Ireland submission on the SWOT has been guided by the documents prepared by the European Network for Rural Development and documents from the European Commission (DG Agri). Article 103(2) of the COM(2018) 392 final Regulation of the European Parliament and of the Council sets out what needs to be in the SWOT. It states that:

**"The SWOT analysis shall be based on the current situation of the area covered by the CAP strategic plan and shall comprise, for each specific objective set out in Article 6(1), a comprehensive overall description of the current situation of the area covered by the CAP Strategic Plan, based on common context indicators and other quantitative and qualitative up-to-date information such as studies, past evaluation reports, sectoral analysis and lessons learned from previous experiences.**

....

**For the specific objectives set out in points (d), (e) and (f) of Article 6(1), the SWOT analysis shall refer to the national plans emanating from the legislative instruments referred to in Annex XI. For the specific objective to attract young farmers set out in point (g) of Article 6(1), the SWOT shall include a short analysis of access to land, land mobility and land restructuring, access of finance and**

---

<sup>1</sup> <https://www.ipbes.net/news/Media-Release-Global-Assessment>

<sup>2</sup> NPWS (2019). The Status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Overview. Unpublished NPWS report

incomes, who the CAP beneficiaries are in Ireland, the data on greenhouse gas emissions in agriculture, the status of birds and habitats, and other biodiversity in farmed landscapes (from the National Parks and Wildlife Service and other sources including BirdWatch Ireland), the status of water quality. The SWOT should provide the background against which the interventions can be checked to ensure that they are justified, relevant and adequate in terms of the optimal use of public funds. But none of this is presented.

Further, in relation to the legal requirements of the CAP Strategic Plan, explicit reference to relevant elements of national plans emanating from environmental and climate legislation (12 Directives/Regulations listed in Annex XI) should be included but are not. So we would have expected to see the current state of the Natura2000 network described in the Prioritised Action Framework (PAF) for Natura2000 as well as the status of birds in the wider countryside including Birds of Conservation Concern in Ireland; the current state of waters, status objectives, pressures and risks described in the River Basin Management Plans (WFD); the current situation and projections with existing policies and measures from the National Energy and Climate Plan;

For each objective we expected to see a full description of the topic and assessment of the Strengths, weaknesses, opportunities and threats. What has been put out for public consultation is a document missing all the background information and any way for a member of the public to be able to respond with coherence.

In summary the SWOT provides no evidence that it is based on the most recent, relevant and reliable evidence or that it is based on common context indicators and relevant indicators coming from other statistical sources (e.g. EUROSTAT and national statistical institutes) or any recent, relevant and reliable quantitative information (Eurostat statistics, FADN, analytical factsheets and national/regional databases). There is no information on data gaps and where quantitative information is not available, or that the analysis might be based on qualitative information. There is no indication that the SWOT is based on solid evidence from studies, evaluations, sectoral analysis, and lessons learned from previous experience across all CAP instruments covered by the CAP Strategic Plan (experiences at EU, national and regional level). There is no evident analysis on access to finance taking into account all available information on financial instruments (e.g. figures on market gaps). We have no evidence to suggest that beyond three public meetings, that there has been any triangulation with the experience or input of relevant stakeholders (including BirdWatch Ireland).

**Summary:**

The SWOT is intended to support the assessment of needs to justify the allocation of public spending to the CAP in Ireland. It is most concerning that what has presented is completely lacking in an evidence and we would suggest could be potentially in breach of Article 103 of the CAP regulation though this has yet to be voted on. It is not in the public interest to issue such a vague document which underpins a significant amount of public spending. If and when the Regulation COM(2018) 392 is approved, the SWOT, should be of high calibre and in compliance with this regulation.

**Point of Contact:**

Oonagh Duggan  
Assistant Head of Policy and Advocacy  
BirdWatch Ireland