



**An Roinn Talmhaíochta,  
Bia agus Mara**  
Department of Agriculture,  
Food and the Marine

## **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.

### *Privacy Statement*

The Department of Agriculture, Food and the Marine is committed to protecting and respecting your privacy and employs appropriate technical and organisational measures to protect your information from unauthorised access. The Department will not process your personal data for any purpose other than that for which they were collected. Personal data may be exchanged with other Government Departments, local authorities, agencies under the aegis of the Department, or other public bodies, in certain circumstances where this is provided for by law.

The Department will only retain your personal data for as long as it is necessary for the purposes for which they were collected and subsequently processed. When the business need to retain this information has expired, it will be examined with a view to destroying the personal data as soon as possible, and in line with Department policy. Further information on Data Protection can be found on our website [here](#).

### RESPONSE FORM

Details:

Full Name: Brendan Dunford

Organisation where applicable: Burren Programme

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

Farmer (full-time)  Farmer (part-time)  Farm family member   
Member of the public  Other  Yes

Are you involved in;

Agriculture  Yes Forestry  Farm Organisation   
Rural Development  Food industry  Environment  Yes  
Community Sector  Research  Civil Society / NGO  Yes

Other: \_\_\_\_\_

Nine specific objectives of the Common Agriculture Policy post 2020

- (a) support viable farm income and resilience across the Union to enhance food security;
- (b) enhance market orientation and increase competitiveness, including greater focus on research, technology and digitalisation;
- (c) improve the farmers' position in the value chain;
- (d) contribute to climate change mitigation and adaptation, as well as sustainable energy;
- (e) foster sustainable development and efficient management of natural resources such as water, soil and air;
- (f) contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes;
- (g) attract young farmers and facilitate business development in rural areas;
- (h) promote employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry;

- (i) 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: Please use a separate template for each objective

<p><b>Objective – (f) contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes;</b></p> <p>Comment: Generally, the SWOT is quite good and covers most points, well done! A few additional reflections below.</p>	
<p><b>Strength</b> The pride of place, and latent interest in nature, of a great many Irish farmers (as shown on <a href="http://www.farmingfornature.ie">www.farmingfornature.ie</a>)</p> <p>Lessons learned (hopefully!) from existing AES, including EIP Agri work</p> <p>A strong farm advisory service across Ireland</p>	<p><b>Weakness</b> Contradictions between Pillar 1 and Pillar 2 payments resulting in habitat loss.</p> <p>Very poor enforcement of regulations, particularly on non-SAC areas, resulting in habitat (eg hedgerow loss, dumping of slurry near waterways).</p> <p>Capacity issues regarding available expertise required to deliver successful AES</p>
<p><b>Opportunity</b> To collectively market the (premium) products and services generated from Irish landscapes managed under EIP AGRI projects, including the Burren, as a way to improve economic viability.</p> <p>To develop new tech solutions to the gathering, storage and analysis of environmental data from farms more efficiently – for example, the HH project app – thus improving monitoring.</p> <p>New potential services to be delivered by farmers including fire prevention (as fire risk grows), flood management (as storms increase) and education (for a more urbanised society)</p>	<p><b>Threat</b> The administrative burden is unnecessarily high in a lot of AES, locally-led ones for example, driving up delivery costs. This could be simplified, for example, by a fixing of payment areas in year 1 of all AES and ignoring any changes in LPIS numbers or areas during the AES contract.</p> <p>Extremely high levels of regulation (through LAs, NPWS, NMS etc) on some of our protected landscapes and the cost of securing permission to undertake necessary works, is a major deterrent to farmers.</p> <p>Loss of farm knowledge particularly on HNV areas which require a high level of expertise to farm them.</p> <p>Viability of HNV farming systems which are mainly extensive mixed livestock farming systems at a time of falling beef prices, Brexit and climate change</p>