



An Roinn Cultúir,  
Oidhreacht agus Gaeltachta  
Department of Culture,  
Heritage and the Gaeltacht

National Parks and Wildlife Service,  


By email: October 11th 2019

**Re: Supporting comments in relation to the DCHG submission on the SWOT analysis**

Dear Mr Waldron,

We very much welcome the opportunity to comment on the SWOT analysis of the sector.

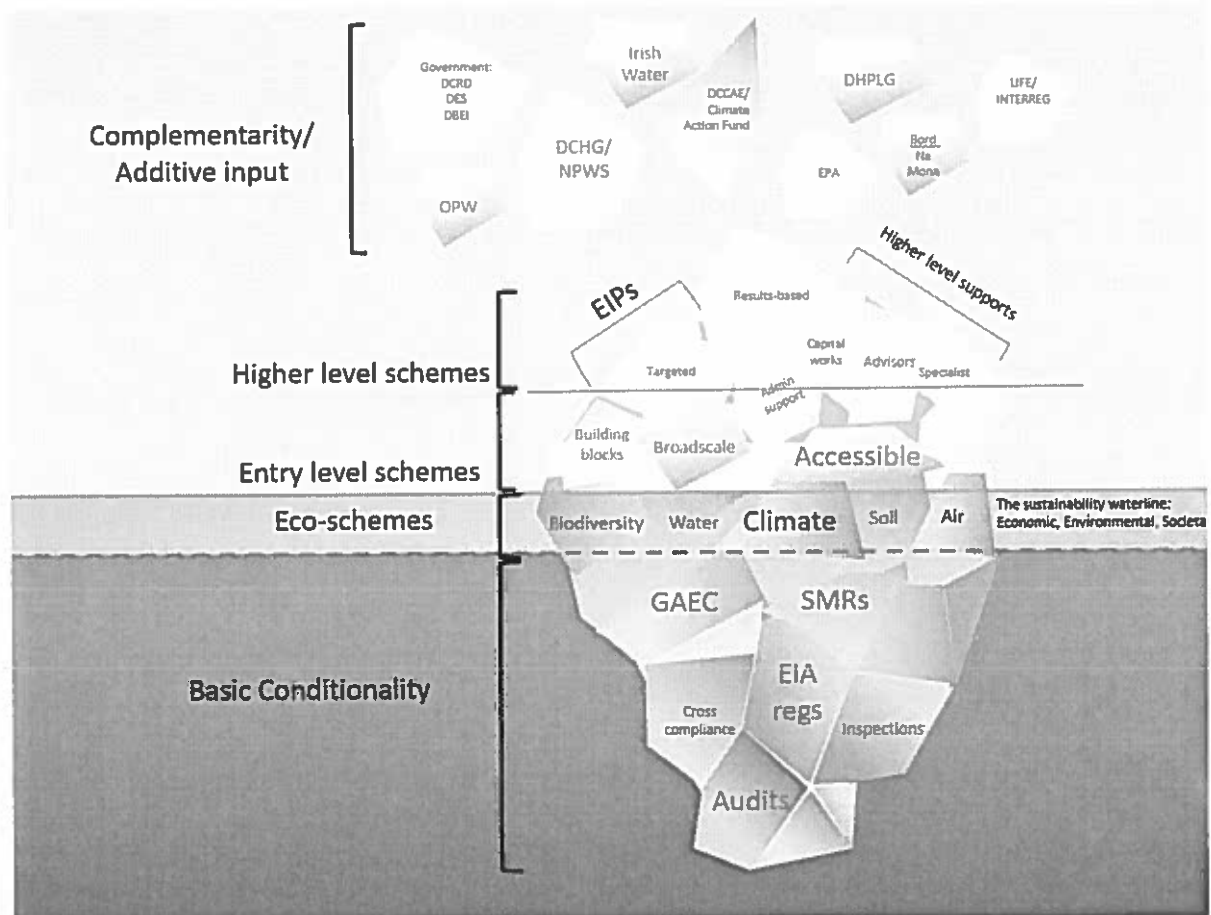
We understand that the SWOT analysis is an important precursor to the needs assessment that will inform the shape and scope of the CAP Strategic Plan. As we have previously outlined in bilateral discussions between our Departments, we feel that CAP funding must deliver measures to address pressures and threats to nature in the farmed landscape, in Natura 2000 sites, in HNV farming systems and to protect and enhance biodiversity more generally. We also acknowledge that CAP funding, while significant, must also deliver on a suite of other priorities and that this is challenging. We suggest that biodiversity, water and climate actions should not be considered as mutually exclusive ambitions; rather they are complementary goals which can be addressed in parallel through well designed interventions.

The Prioritised Action Framework (PAF) will outline the Natura priorities for Ireland in the next period, and this will include, but is not limited to, the CAP. It is also acknowledged that additional capacity, resources and supports need to be provisioned to bring added-value to the CAP in the context of these environmental goals. This will involve other Government Departments and agencies, industry and public/private partnerships.

We need to be smart in leveraging extra value from the CAP, not just to close recent compliance cases against Ireland, but also to show that EU/taxpayer money is delivering real results. This will have a benefit for climate, water and biodiversity, but will also help protect farming incomes, enhance rural sustainability and strengthen Ireland's green credentials.

From the perspective of this Department, we are happy to continue to engage in developing a common vision and shared responsibility in this area, to cover a period extending beyond the next CAP cycle. This will involve building on the existing good relationship between our Departments, to ensure better coherence in the areas of our shared responsibilities.

Obviously the detail of the components of the CAP Strategic Plan will emerge over time, and there is no benefit at this stage in going into detail on the potential for various measures. However we feel strongly that there is real value in considering the structure and operating assumptions in relation to the CSP. Some high level points are mentioned below and are outlined in a simple schematic that was prepared during internal discussions on these topics.



We feel that Pillar 1 needs to be strengthened as a baseline in the next period. Unless we collectively address the real issues arising in the context of land eligibility, and the effects of policy in that area, Ireland will face a significant challenge in efforts to protect biodiversity and address climate and water issues. Existing habitats should be retained and supported under Pillar 1, and we can focus on enhancing them under Pillar 2. If Pillar 1 eligibility issues are not resolved in the next period, we feel that focusing on investments in Pillar 2 would be inefficient. There is also a value in allowing eligibility for Pillar 2 payments even where Pillar 1 payments are justifiably ruled out. We are prepared to assist in any way possible to enhance protection of habitats under Pillar 1.

There needs to be clarity on the BPS forms that data will be shared with relevant Government Departments and agencies, including Natura information with this Department.

We are operating somewhat in a vacuum in the context of ecoschemes, but we see value in considering annual commitments

- for habitat mapping at farm level (and possibly some simple management in subsequent years)
- for commonages, where shareholders input and adhere to stocking levels determined through the current CMPs. The current system is not working due to limited participation, so a Pillar 1 scheme is absolutely necessary if we are to come up with sustainable stocking rates. This might then be a precursor to a Pillar 2 upland/peatland measure, which would include private land.
- for Natura 2000 land, whereby farmers are paid an annual amount (not per hectare) for the paperwork, bureaucracy and ecosystem services they provide.

We would propose that Pillar 2 should have two tiers, one general (with prescription based measures) and a higher level for priority environmental assets (with results-based scoring, specialised advisory support, access to capital funds etc). For those higher level schemes that are biodiversity focused, this Department could consider the resources we could bring to support the delivery of measures and funding provided through the CAP. Successful EIPs, the Burren Programme, efforts for Curlew, species-rich grassland measures, upland measures etc, could be brought forward in this tier, including other in the water and climate species. This would deliver on Commissioner Hogan's ambition for the delivery of improved outcomes and the conclusion of "one size fits all" approaches. An added benefit would be the simplification of the current GLAS measures and a reduction in the number of general measures. A dedicated fund should be ring-fenced for the higher-level measures and this could be supported by other national funds or through EU funding (eg LIFE Strategic Nature Projects).

Through cooperation in the CSP, LIFE and the NPWS farm plan scheme, partnership could be built between Departments to the benefit of the stated environmental objectives of the CAP and ambitions of the Nature directives. Greater engagement between Departments would also ensure greater coherence between schemes, particularly when it comes to scheme design.

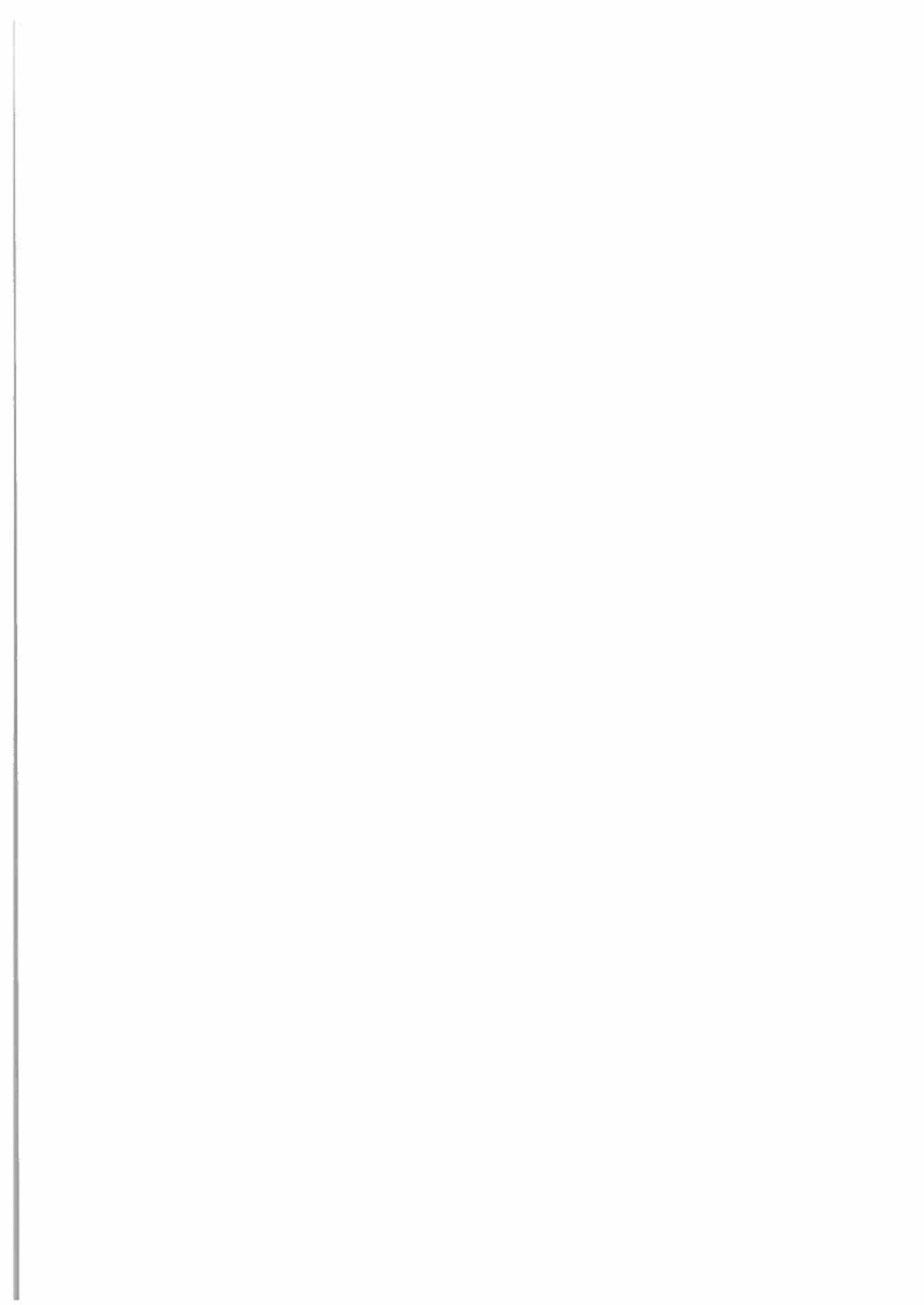
We would support developing new EIPs in the next operating period and are happy to assist in identifying priorities and in the evaluation of submissions.

Improved cooperation in the area of screening for AA, EIA Agriculture Regulations, cross compliance and cross reporting, GAEC 2, GAEC 10 and of course dialogue with respect to biodiversity measures would be welcomed in the next period.

Yours sincerely,



**Andy Bleasdale, NPWS**



**Objective 1 Support viable farm income and resilience across the Union to enhance food security**

<b>STRENGTHS</b>	<b>WEAKNESSES</b>
<p>S1: Agriculture – largest indigenous sector in the economy</p> <p>S2: Temperate climate conducive for our grass-based production systems</p> <p>S3: Low level of debt on Irish farms</p> <p>S4: Viability of some sectors</p> <p>S5: Effective development and delivery of schemes supporting family farm income</p> <p>S6: Strong historical association with land and farming</p> <p>S7: Skilled farming workforce and training availability</p>	<p>W1: Low income in agri-sector compared to other sectors of the economy</p> <p>W2: Low profitability / viability in some sectors</p> <p>W3: Increase in input costs</p> <p>W4: Highly dependent on CAP payments</p> <p>W5: Low level of diversification to mitigate risk</p> <p>W6: Lack of risk management tools/knowledge</p> <p>W7: Reactive nature of ad hoc schemes to address weather and other crises in the sector.</p> <p>W8: Inadequate support for the parts of the farm that do not conform to purely agricultural output</p> <p>W9: On farm diversification is very low</p> <p>W10: The sector is not sufficiently climate resilient due to lack of diversification</p>
<b>OPPORTUNITIES</b>	<b>THREATS</b>

<p>O1: Use of new technologies to reduce input costs and increase efficiency (e.g. precision farming)</p> <p>O2: Growth of bio-economy</p> <p>O3: Increasing demand for safe, nutritious, authentic, organic food produced to high standards of environmental protection and animal welfare</p> <p>O4: Increasing global consumer demand for protein sources</p> <p>O5: Increase value added at farm level</p> <p>O6: Development of risk management tools</p> <p>O7: Increase knowledge base of farmers on risk management tools</p> <p>O8: Pay for wider environmental services (carbon, water, biodiversity, pollinators, etc.) to reflect the true value of land and reward farmers for the provision of same</p> <p>O9: Move to multi-use models e.g. food, agro-forestry, permaculture, provision of environmental goods and services</p> <p>O10: Ability to grow fresh green vegetable produce</p>	<p>T1: Ongoing price volatility in global markets</p> <p>T2: BREXIT</p> <p>T3: Reduced CAP budget</p> <p>T4: Costs of compliance with EU's higher environmental and sanitary production standards</p> <p>T5: Effects of Climate change, biodiversity loss and degradation</p> <p>T6: Demographics and the need for generational renewal to increase up take of new technology</p> <p>T7: Increase National/ EU regulation</p> <p>T8: Land Eligibility issues are an ongoing issue for farmers that manage important habitats or land in an extensive manner</p> <p>T9: Expansion of certain sectors at expense of others; larger farmers buying out smaller farmers</p> <p>T10: Inappropriate afforestation of HNV farmland, isolation of remaining farmers leading to further exits from farming in particular areas</p> <p>T11: Focusing agri-model on short-term markets</p> <p>T12: Continued rural decline and movement of younger generations away from farming</p> <p>T13: Abandonment of food production in HNV areas (move to commercial forestry/wind energy etc.)</p>
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**Objective 2 Enhance market orientation and increase competitiveness, including greater focus on research, technology and digitalisation**

<p><b>STRENGTHS</b></p> <p>S1: Increased exports and value-added targets at the heart of the sectors ten-year strategy FW 2025</p> <p>S2: Growing trade surplus with EU and non-EU</p> <p>S3: Temperate climate provides competitive advantage for grass-based production systems</p> <p>S4: Investment levels are increasing</p> <p>S5: Farm productivity levels are increasing</p> <p>S6: Reputation of sustainable Quality Assurance Schemes</p> <p>S7: Strong animal health and disease controls standards</p> <p>S8: Wide range of State support for research, innovation and competitiveness</p> <p>S9: Ability to grow fresh green vegetable produce</p>	<p><b>WEAKNESSES</b></p> <p>W1: Difficult to avail of / achieve economies of scale</p> <p>W2: Wide variation in levels of innovation and adoption of new technologies</p> <p>W3: Variation in investment across sectors</p> <p>W4: Lack of access to high speed broadband in rural areas</p> <p>W5: Lack of innovation infrastructure</p> <p>W6: Lack of Producer Organisations</p> <p>W7: Overreliance on individual markets eg UK</p> <p>W8: Costs of compliance with EU's higher environmental and sanitary production standards</p> <p>W9: Inadequate support for the parts of the farm that do not conform to purely agricultural output</p>
<p><b>OPPORTUNITIES</b></p> <p>O1: Increased consumer demand for high quality, nutritious, sustainable, welfare friendly food</p> <p>O2: Improve access to credit</p> <p>O3: Import substitution e.g. protein crops, feedstuffs</p> <p>O4: Use of new technologies to reduce input costs, increase efficiency and add value</p> <p>O5: Further develop Circular economy and bio-economy</p> <p>O6: Open new markets and expand existing markets</p> <p>O7: Encourage greater producer participation in Producer Organisations</p> <p>O8: Co-operation with Research Institutions in technological innovations and digitalization</p> <p>O9: Local produce, local markets, lower environmental footprints</p> <p>O10: Pay for wider environmental services (carbon, water, biodiversity, pollinators, etc.) to reflect the true value of land and reward farmers for the provision of same</p>	<p><b>THREATS</b></p> <p>T1: Market volatility, price variations</p> <p>T2: Rising cost of inputs</p> <p>T3: Effects of climate change, biodiversity loss and degradation on primary production</p> <p>T4: Capability and capacity of sector to adjust to new demands/ challenges</p> <p>T5: Labour shortages at both primary and secondary stages of production</p> <p>T6: Costs of compliance with EU's higher environmental and sanitary production standards</p> <p>T7: Farmers focusing on outdated models, with excessive input costs to produce food in a way that is not the most appropriate to their land</p> <p>T8: Farmers increasingly borrowing from banks</p> <p>T9: Farmers increasingly undertaking works to intensify without appropriate consideration of the environment or the relevant legislation</p>

O11: Move to multi-use models e.g. food, agro-forestry, permaculture, provision of environmental goods and services

LEAFARO



**Objective 3 improve the farmers' position in the value chain**

STRENGTHS	WEAKNESSES
<p>S1: Sustainable Quality Assurance Schemes</p> <p>S2: Producer Organisations in Horticulture sector</p> <p>S3: Cooperative structure in the dairy sector</p> <p>S4: Contract prices in dairy sector</p> <p>S5: EU initiatives focusing on greater transparency in the food chain</p> <p><b>OPPORTUNITIES</b></p> <p>O1: Growing demand for 'natural' based food production systems provides opportunities for premiumisation by primary producers</p> <p>O2: Consumer demand for local produce</p> <p>O3: Potential expansion of organic farming sector</p> <p>O4: Increase the number of Producer Organisations</p> <p>O5: Introduction of legislation to protect primary producers</p> <p>O6: Advances in animal and crop breeding technologies</p> <p>O7: Development of contractual relationships between farmers and processors.</p> <p>O8: Pay for wider environmental services (carbon, water, biodiversity, pollinators, etc.) to reflect the true value of land and reward farmers for the provision of same</p>	<p>W1: Share of value added reducing for primary producer</p> <p>W2: Share of value added below EU average</p> <p>W3: Fragmented nature of sector</p> <p>W4: Costs of compliance with EU's higher environmental and sanitary production standards</p> <p>W5: Low number of Irish PDOs/PGIs &amp; TSGs</p> <p>W6: Lack of accurate data for value chain</p> <p>W7: Low number of Producer Organisations</p> <p>W8: Lack of competition in the meat processing sector</p> <p><b>THREATS</b></p> <p>T1: Market volatility, price variations and input costs</p> <p>T2: Costs of compliance with EU's higher environmental and sanitary production standards</p> <p>T3: Changing consumer tastes</p> <p>T4: Consumer awareness of environmental impacts</p> <p>T5: Continued/increased subsidy for non-food production e.g. commercial forestry</p> <p>T6: Soil degradation - soil being central to the value chain</p> <p>T7: Increased environmental awareness in larger corporations will have ramifications throughout the supply chain</p>

**Objective 8: promote employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry;**

STRENGTHS	WEAKNESSES
<p>S1: Dedicated Government Department for Rural Development</p> <p>S2: Whole of Government approach through Action Plan for Rural Development</p> <p>S3: Project Ireland 2040 has strategic objective of Strengthened Rural Economies and Communities</p> <p>S4: Strong Community involvement and commitment to engage and deliver locally</p> <p>S5: Coherent approach to local development with integrated structure for delivery</p> <p>S6: Substantial agri-food industry with diverse geographic spread</p> <p>S7: Strong tourism sector</p> <p>S8: Good quality of life combined with culture and heritage resources</p> <p>S9: Coherent Government Strategy for the bioeconomy</p> <p>S10: Dedicated national implementation activities for the bioeconomy</p> <p>S11: Successive publicly funded forestry programmes will result in strong projections for timber output from Irish forests to 2030</p> <p>S12: Downstream multiplier effect on employment in the forestry sector</p>	<p>W1: Number of social groups at risk of social exclusion, isolation and poverty deprivation</p> <p>W2: Low levels of women working in agriculture</p> <p>W3: Lower levels of, or limited access to services including transport infrastructure, healthcare and education compared to large urban centres</p> <p>W4: Lack of diverse employment opportunities compared to large urban centres</p> <p>W5: Fragmented nature of forestry sector and absence of career path</p> <p>W6: High value markets are poorly developed for hardwood resource</p> <p>W7: Lack of awareness of the circular and the Bio economy</p> <p>W8: Inappropriate afforestation of HNV farmland, isolation of remaining farmers leading to further exits from farming in particular areas</p> <p>W9: Focusing agri-model on short-term markets</p> <p>W10: Continued rural decline and movement of younger generations away from farming</p> <p>W11: Incompatibility between forestry and Pillar 2 payments and outcomes in certain areas</p>
OPPORTUNITIES	THREATS
<p>O1: Building capacities of communities (enabling and supporting rural communities)</p> <p>O2: Develop tourism industry in rural areas in a sustainable way</p> <p>O3: Improve availability of, and access to, necessary services in rural areas</p> <p>O4: Increase employment rates, and expand employment options in rural areas</p> <p>O5: Increase opportunities for rural female entrepreneurs</p> <p>O6: Optimising digital connectivity for employment (eg remote working)</p>	<p>T1: Demographic profile and the need for generational renewal</p> <p>T2: Lower levels of services and over reliance on traditional employment options</p> <p>T3: Changing nature of retail, service delivery and town centre living</p> <p>T4: Climate change – economic, social and environmental impacts</p> <p>T5: Increased compliance and regulatory requirements for Community and Voluntary Sector</p> <p>T6: Rural isolation, with a particular recognition of its impact on mental health</p>

O7: Maximise the economic and social potential of the bio economy and circular economy

O8: Provision of renewable energy sources, including through community-based schemes

O9: Increase native tree afforestation rates

O10: Increase opportunities for diversification of farm enterprise

O11: Increased market opportunities for wood particularly in the construction and energy sectors

O12: Local produce, local markets, lower environmental footprints

O13: Pay for wider environmental services (carbon, water, biodiversity pollinators, etc.) to reflect the true value of land and reward farmers for the provision of same

O14: Move to multi-use models e.g. food, agro-forestry, permaculture, provision of environmental goods & services.

T7: Not maximising opportunities presented by digital economy

T8: Brexit

T10: Forestry – emerging plant pests and diseases as well as the fragmentation of landscapes

T11: Focusing agri-model on short-term markets and increased reliance on international markets

T12: Continued rural decline and movement of younger generations away from farming

T13: Inappropriate afforestation of HNV farmland, isolation of remaining farmers leading to further exits from farming in particular areas

**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**

<u>Strength</u>	<u>Weakness</u>
<p>S1: National Plan on Antimicrobial Resistance</p> <p>S2: Antibiotics usage in Ireland is below the EU average</p> <p>S3: National Plan on the Sustainable use of Pesticides</p> <p>S4: National Farmed Animal Health Strategy</p> <p>S5: Animal Welfare Strategy</p> <p>S6: The establishment of Animal Health Ireland</p> <p>S7: Agri-food industry supporting initiative in animal health and welfare</p> <p>S8: Food safety and Food Authenticity Strategy</p> <p>S9: Sustainable Healthy Agri-Food Research Plan</p> <p>S10: Strategy for the Development of the Organic Sector</p> <p>S11: Increasing percentage of UAA organically farmed</p> <p>S12: Quality Assurance Schemes</p> <p>S13: National Food Waste reduction schemes</p>	<p>W1: Increased sales of antibiotics</p> <p>W2: Low level of understanding of AMR development and its transmission</p> <p>W3: Lack of available systems to monitor usage of antibiotics</p> <p>W4: Low level of organic farming in Ireland</p> <p>W5: Reliance on imports of certain animal feeds</p> <p>W6: Lack of robust system to measure farming effort in relation to the provision of safe food and high animal health and welfare standards.</p> <p>W7: Lack of coherent approach to bio security measures</p> <p>W8: Lack of accurate data on food waste</p> <p>W9: : Inadequate support for the parts of the farm that do not conform to purely agricultural output</p> <p>W10: Expansion of certain sectors at expense of others; larger farmers buying out smaller farmers</p> <p>W11: Inappropriate afforestation of HNV farmland with resultant loss of environmental services/habitats/resilience etc.</p> <p>W12: Lack of regulatory enforcement may encourage more farmers to be non-compliant</p>

<p><b>Opportunity</b></p> <p>O1: Improvements and developments of vaccines</p> <p>O2: Development of database to monitor antibiotic usage</p> <p>O3: Increasing consumer demand for Organic produce / sustainably produced food</p> <p>O4: Increasing consumer demand / awareness for provenance of food vis a vis safety and health and welfare of animals</p> <p>O5: Increase targeted advisory service on animal health</p> <p>O6: Synergies between various strategies</p> <p>O7: Local produce, local markets, lower environmental footprints</p> <p>O8: Pay for wider environmental services (carbon, water, biodiversity, pollinators, etc.) to reflect the true value of land and reward farmers for the provision of same</p> <p>O9: Move to multi-use models e.g. food, agro-forestry, permaculture, provision of environmental goods and services</p>	<p><b>Threat</b></p> <p>T1: Increased levels of intensive farming</p> <p>T2: Any reduction in animal welfare standards</p> <p>T3: Climate change</p> <p>T4: Slowdown in generational renewal could affect uptake of appropriate practices</p> <p>T5: New and emerging diseases</p> <p>T6: Increased regulation and cost of compliance</p> <p>T7: Land Eligibility issues are an ongoing issue for farmers that manage important habitats or land in an extensive manner</p> <p>T8: Expansion of certain sectors at expense of others; larger farmers buying out smaller farmers</p> <p>T9: Inappropriate afforestation of HNV farmland, isolation of remaining farmers leading to further exits from farming in particular areas</p>
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