



**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**

#### **1. Details:**

Full Name: \_\_Charles Stanley-Smith

Organisation where applicable: c/o Environmental Pillar\_

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

#### **2. Are you involved in:**

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

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

#### **3. 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.

These comments relate to your draft SWOT.

### Objective 1

S1. Can you give a reference to support this – Tourism also claims to be largest indigenous

S3. I cannot understand this claim as this averages €120K per farm

S4. I take it that this is contra to W2 Low profitability /viability in some sectors – Can you detail the sectors

O4 – What kind of protein sources

Can you add the following Threats:

Breaching of ammonia levels leading to reduction of imported fertilizers

Changes in Global Diets, influenced by peoples increased knowledge of Climate Change caused by Beef & Dairy

### Objective 2

Can you add the following Threats:

Over greenwashing leading to loss of confidence in Irish Agriculture if found out

Changes in Global Diets, influenced by peoples increased knowledge of Climate Change caused by Beef & Dairy

### Objective 3

O3: Should not have word potential – it should be Expansion of organic farming sector

Can you add the following Weaknesses:

Lack of significant support for organic farming sector

### Objective 4

S2. Grass based production system with low carbon footprint – not true if spread with imported fertilizers

W7. I take it these include CH4 & NO2

Can you add the following Weaknesses:

Large increase in imported Nitrogen fertilizers

Lack of real protection for hedgerows, individual trees and non-forest woodland (S4)

O12: It's the rapid change in the Climate situation that is the problem, there will be no time for adaptation by other crop types before rapid temperature increases make these new types unviable

Can you add the following Threats:

Biodiversity loss

Poor definition (at EU level) of what is **renewable** biomass

## Objective 5

Can you add the following Weaknesses:

Lack of real protection for hedgerows, individual trees and non-forest woodland (S4)

Tendency to try remove hedgerows, individual trees and non-forest woodland to increase available acreage

Lack of support for the Polluter pays principle

Can you add the following Threats:

Biodiversity Loss

High numbers of Nitrates Derogations

Inability to improve water quality

## Objective 6

S1. Majority of threatened species are in favourable and stable status –**absolutely opposite - Please provide references to show this be true**

S7. Strong policy framework to protect and enhance biodiversity – **Absolute opposite – weak policies anti biodiversity policies open to constant watering down and lack of enforcement**

W2: Farmland bird species are in decline –add **to critical status**

Weakness **add**

Continuing harvesting and burning of peat

Continuing harvesting of peat for horticultural use

Lack of polluter pays principle

Lack of willingness & manpower to prosecute