



**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 submitting 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: Eoghan McCarthy

Organisation where applicable Gas Networks Ireland

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

Other: Gas Infrastructure Utility

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

GNI welcomes the opportunity to comment on the draft SWOT analysis and recommends the addition of three opportunities as detailed below.

|  |                 |
|--|-----------------|
| <b>Objective 4 - Contribute to climate change mitigation and adaption, as well as sustainable energy</b>                       |                 |
| <b>Strength</b>  | <b>Weakness</b> |
| <b>Opportunity</b><br><br><b>O18:</b> Develop anaerobic digestion plants to produce renewable gas and reduce carbon emissions. | <b>Threat</b>   |

Gas Networks Ireland (GNI) suggests O18 above is added as an opportunity to objective 4. Renewable gas<sup>1</sup>, produced through anaerobic digestion (AD), is a carbon neutral<sup>2</sup> and sustainable source of fuel that can be injected into the gas network and used in the same way as natural gas. The reduction in carbon emissions from renewable gas can be attributed to the following actions:

- **Avoided methane emissions from animal slurry:** Slurry naturally emits methane. By sending it to AD plants, methane can be successfully captured and emissions avoided. This methane is then used in the production of renewable gas.
- **Production of digestate (high potency bio-fertiliser):** There are carbon emissions associated with the production and transportation of chemical fertiliser products. Replacing chemical fertilisers with digestate (a naturally occurring by-product of the AD process) will result in avoided emissions for the agricultural sector. Additionally, as this digestate is of a high quality,

<sup>1</sup> <https://www.gasnetworks.ie/corporate/company/our-commitment/environment/renewable-gas/>

<sup>2</sup> Renewable Gas is considered a carbon-neutral fuel because it comes from organic sources that once absorbed carbon dioxide from the atmosphere during photosynthesis.

its application to land can result in higher levels of carbon being sequestered into the soil, with the land becoming a carbon sink.

- **Utilisation of agricultural wastes and catch/rotation cropping:** The re-use of agricultural waste streams within the farm and catch cropping during periods of no rotation results in reduced emissions through better resource management and promoting the sequestration of carbon into the soil.

GNI is currently working to develop new renewable gas injection points on the gas network with a target of 20% renewable gas on the network within a decade.

|  |                 |
|--|-----------------|
| <b>Objective 5 - Foster sustainable development and efficient management of natural resources such as water, soil and air</b>                          |                 |
| <b>Strength</b>  | <b>Weakness</b> |
| <b>Opportunity</b><br><br><b>O12:</b> Displace chemical fertiliser with lower carbon digestate produced as a by-product of anaerobic digestion plants. | <b>Threat</b>   |

GNI recommends an additional opportunity is added to account for the potential for digestate to be used in place of chemical fertiliser. See comment above for details on how digestate reduces carbon emissions relative to chemical fertiliser.

|   |                 |
|---|-----------------|
| <b>Objective 8 - promote employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry;</b> |                 |
| <b>Strength</b>   | <b>Weakness</b> |

| Opportunity  | Threat |
|--|--------|
| <p><b>O12:</b> Generate new income streams and employment for rural communities through development of anaerobic digestion plants.</p> |        |

In addition, digestate contributes to better water quality. Digestate through its application is less susceptible to run off than raw fertiliser applied using a splash plate.

GNI suggest O12 above is added to objective 8. Locating AD plants in rural areas would provide additional revenue sources for these communities in the following ways:

- The sale of feedstocks for the AD plants.
- Bio-fertiliser sales.
- Sales of renewable gas.

The SEAI<sup>3</sup> estimates that stimulating a renewable gas industry in Ireland could contribute directly to over 5000 jobs during plant construction and over 3000 jobs in plant operations. With ongoing uncertainty regarding agricultural exports to the UK, post Brexit supplementary income streams for farming are important.

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<sup>3</sup> <https://www.seai.ie/publications/Assessment-of-Cost-and-Benefits-of-Biogas-and-Biomethane-in-Ireland.pdf>