



**SUBMISSION TO THE PUBLIC CONSULTATION ON THE
STRENGTHS WEAKNESSES OPPORTUNITIES THREATS
ANALYSIS FOR THE CAP STRATEGIC PLAN POST 2020**

Green Party Ireland

October 2019

Summary & General Comments

The Green Party welcomes the opportunity to respond to this public consultation on the Common Agricultural Policy (CAP) post 2020.

The CAP's objectives, which remain unchanged since 1962, should be radically reviewed to reflect social demands and the finite limits of our environment and planetary resources, and to fully and completely take into account climate change, critical biodiversity decline and ecosystem collapse, and depletion of our Planet's resources. It affects us all.

The last CAP reform CAP did include greening measures and some targeting of money to address environmental issues; yet many of these provisions have been watered down.

Hence, the key challenges for a more coherent food policy still remain; climate change, biodiversity loss, animal welfare, and protection of both public and environmental health.

We must focus future policies on providing sufficient nutritious and healthy food while reducing food waste, to ensure the sustainable use of natural resources, to reward farmers with an adequate and stable income and, to create resilient rural communities. A necessity is to reduce corporate influence in the food system and rebalancing trading relationships

In general, there must be greater coherence with sustainable development goals.

What is needed is a profound and comprehensive reform of agriculture and food policy. To make a concrete shift towards a sustainable agriculture that goes beyond rhetoric, we must widen the lens beyond the CAP, from agriculture to food systems, towards the creation of a Common Food Policy. Such a policy must be coherent, fair and truly sustainable. As such it will be more acceptable to EU citizens who are increasingly aware of food system issues.

Reforming the agricultural sector without reforming the whole food system will be ineffective. Agriculture, food safety and public health, fair trade, environmental protection, climate and energy, economic and social cohesion, rural and international development, employment and education all jointly define our food system. But their policies are developed largely in isolation from each other. From here on, this must change.

Our vision is of an agricultural and food policy which supports the transition to a socially inclusive, agroecological model. The policy must deliver sufficient healthy, nutritious, quality food to all EU citizens, respect social and labour rights of workers and migrants, give a fair return on all resources used, and support micro to medium sized farms and food producers.

Farming and food system investment must be enabled and soil fertility rebuilt. Resources must be productively used. To regenerate the human resource base, agriculture and rural economies must be attractive to farmers, rural dwellers and businesses, across all areas. And such will include delivering numerous public goods like restoring biodiversity, enhancing animal welfare, managing water catchments and minimizing air and water pollution.

Objective 1

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

This objective is self-limiting and should be expanded to include such as delivering public goods in terms of, for example, water catchment management, biodiversity regeneration and carbon storage. Modern day farms are about more than just producing food.

STRENGTHS	WEAKNESSES
<p>Maritime climate conducive for multi-species grass-based production systems</p> <p>Temperate climate conducive for growing a variety of tree species</p> <p>Existence of CAP Payments</p> <p>Small, diverse farm structures which can support vibrant local economies.</p> <p>A farm-scale that appeals to issues-aware food consumers.</p>	<p>Increase in input costs</p> <p>Highly dependent on CAP payments</p> <p>Low level of diversification to mitigate risk</p> <p>Too many, reactive, ad hoc schemes to address crises (from climate change, market volatility, etc) in the sector because of an absence of resilience in the sector.</p> <p>Focus has been on global markets, instead of high value, more nuanced markets better suited to the scale of local farms.</p> <p>Absence of support for farmers to move away from synthetic, usually purchased, inputs.</p> <p>Absence of support for farmers to adopt low intensity farming models.</p> <p>No “Just Transition” in place for farming.</p> <p>Absence of competition within processing sector, too few route-to-market options and a lack of consumer-facing products directly linked to on-farm practices and/or localities.</p>

OPPORTUNITIES	THREATS
<p>Use of natural farming methods, such as regenerative farming, to reduce [often polluting] input usage and costs.</p>	<p>Climate Change – continued extremes of weather</p>
<p>Use of diverse grass species to reduce [often polluting] fertilizer usage and costs.</p>	<p>Ongoing price volatility in global markets</p>
<p>Use of min-till and zero-till to enhance soil quality, minimize soil carbon loss and reduce dependency on pesticides.</p>	<p>Brexit and major export market disruption.</p>
<p>Rewetting of peatlands for carbon storage and paludiculture.</p>	<p>Reduced CAP budget</p>
<p>Increasing demand for nutritious, authentic, [often] organic food produced to high standards of environmental protection and animal welfare. These should enhance farm-gate prices and incomes.</p>	<p>Demographics and the need for generational renewal to redevelop our food systems</p>
<p>The opportunity to produce a far greater diversity of food for the local market and to diversify farm and rural incomes and lower market risks.</p>	<p>Increasing National and/or EU regulation, and especially where it consequentially and directly limits the route of market options between the farmer and the consumer.</p>
<p>Greater utilisation of native breeds, suited to our climate and landscapes.</p>	<p>Changing consumer trends.</p>
<p>Greater, more flexible afforestation schemes.</p>	<p>Debt and dependency traps of technological solutions. Too great a belief in the likes of precision farming and too little on using natural systems and farm management skills.</p>
<p>Agri-tourism</p>	<p>The declining effectiveness of many common pesticides and animal health products as the natural resistance to them grows.</p>
	<p>Regulatory removal of pesticides and animal health products that have been shown to be detrimental to the wider environment.</p>

Objective 2

Enhance market orientation and increase competitiveness, including greater focus on research, technology and digitalisation

Technology is often offered as panacea for all difficulties, agricultural, economic or social. It is often to the detriment of farmers. The technological treadmill in agriculture is a well-known concept. Its impact is greater on indebted farms. But such piecemeal fixes are misleading. Over reliance on such technological solutions tends to ignore the fact that food is produced in living ecosystems subject to natural and man-made variability. Our increasing reliance on technology has not enhanced the resilience of our food systems or the environment in which they operate.

<p>STRENGTHS</p> <p>Potential to transition to farming models less reliant on technology, and high cost inputs.</p> <p>Maritime climate provides advantages for low input, pasture-based systems that are less reliant on high-cost, environmentally damaging grain imports. The latter may include GMO's that are not acceptable to target-market consumers.</p> <p>A green image of Ireland with small diverse, family-owned farms.</p>	<p>WEAKNESSES</p> <p>Overreliance on producing volumes of “commodity product” rather than aiming to produce a higher quality, higher value food. The latter may include locally added value.</p> <p>Research has to date focused largely on maximizing production and increasing production efficiency rather than improving quality and enhancing farm-gate prices.</p> <p>Dairy sector and bobby calves.</p> <p>Live exports are typically unacceptable to premium-paying, issues aware consumers.</p> <p>Bord Bia's Origin Green under increasing scrutiny as 'Greenwashing'</p> <p>Absence of high-speed broadband in many rural areas.</p>
<p>OPPORTUNITIES</p> <p>Transition to a unique, nature friendly way of farming.</p> <p>Increasing demand for organic food, in the EU in particular. Likewise for premium foods with a strong provenance linked to the soil, the farm and the locality.</p> <p>Meet changing consumer demands for “less but better” in relation to milk and beef production. Better includes high standards</p>	<p>THREATS</p> <p>Climate Change</p> <p>Brexit</p> <p>Market volatility and price variations</p> <p>Rising cost of inputs and labour shortages</p>

<p>of environmental protection and animal welfare.</p> <p>Transition to higher welfare, outdoor based systems for pigs and poultry.</p> <p>Arable crop growing for human rather than animal consumption.</p> <p>Increased development for horticulture sector – to meet domestic market first.</p>	
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Objective 3

Improve the farmers' position in the value chain

<p>STRENGTHS</p> <p>Farmers own initiatives to do just this, through direct sales, adding value inside farm gate and enhancing provenance.</p> <p>Producer Organisations and especially ones built around processing farm produce into products rather than just selling.</p> <p>Organic Farming (Scheme)</p> <p>Direct Sales</p>	<p>WEAKNESSES</p> <p>Share of value added reducing for primary producer</p> <p>Poor transparency throughout the supply chain – from farm to fork</p> <p>Supply chains too long</p> <p>Too much focus on cheap commodity production and the primary processing of raw materials for corporate-controlled entities to add significant value to.</p> <p>Too much faith in generic marketing and the idea of 'Brand Ireland'.</p> <p>Absence of support for innovative farmers</p> <p>Absence of a varied routes to market. Too much focus on farm support and too little on support for diversifying the routes to-market, some of which may be farmer controlled.</p> <p>Absence of smaller-scale, local, independent abattoirs and cooperatives for local growers.</p>
<p>OPPORTUNITIES</p> <p>Growing demand from discerning consumers for environmentally friendly, low carbon, high animal welfare food.</p> <p>Consumer demand for local produce</p> <p>Potential expansion of organic farming sector</p> <p>Development of regionally produced food</p> <p>EU initiatives focusing on greater transparency in the food chain</p> <p>Development of relationships between farmers and consumers.</p>	<p>THREATS</p> <p>Market volatility, output price variations and input cost rises</p> <p>Changing consumer tastes. Failing to move with consumer demand.</p> <p>A lack of supply-chain flexibility to meet the demands of consumers and especially from those willing and able to pay a premium.</p> <p>Routes to market that do not transmit price premiums from consumer to the farmer</p> <p>Processor demands for constant year-round supply, instead of focussing on seasonal quality.</p>

Objective 4

Contribute to climate change mitigation and adaption, as well as sustainable energy

<p>STRENGTHS</p> <p>National aim of an approach to carbon neutral in agriculture and land use sector</p> <p>Grass-based production systems that can be changed to minimize emissions and sequester carbon.</p> <p>Existing hedgerows, trees and intact peatlands. All of which can be enhanced.</p>	<p>WEAKNESSES</p> <p>Highest share of GHG emissions comes from agriculture</p> <p>Agricultural GHG emissions are increasing</p> <p>Nitrates derogation farms are a very significant intensive farming cohort</p> <p>Dairy herd expansion is faster than mitigation capacity</p> <p>Ireland has one of the lowest levels of forest cover in Europe</p> <p>Declining afforestation rates in recent years</p> <p>Ongoing drainage of organic soils (grasslands and wetlands)</p> <p>High % of non-CO2 emissions in Ireland due to agriculture</p> <p>Sub-optimal soil fertility</p> <p>Reliance on peat in horticultural sector</p> <p>Production of renewable energy at farm level is quite low</p> <p>Difficulties in accessing the national grid</p> <p>Irish farms have become less diverse which makes them more vulnerable to climate events market volatility (many are single enterprise systems)</p>
<p>OPPORTUNITIES</p> <p>Reducing nitrogen-related emissions</p> <p>Improve livestock management including through extended grazing of mixed species swards.</p>	<p>THREATS</p> <p>FoodWise 2025</p> <p>Continued increase in agriculture emissions</p>

<p>Improve animal production efficiency</p> <p>Improve on-farm slurry management</p> <p>Better Management of existing peatlands, and rewetting of peatlands for carbon storage and paludiculture.</p> <p>Improve soil management and fertility</p> <p>Increasing relatively low level of forest cover and favourable growing conditions</p> <p>Support diversification to lower carbon intensity farming.</p> <p>Up-skill advisory service and engagement with stakeholders/industry</p> <p>Upskill educators in our network of Agricultural Colleges in environmentally efficient farming methods, soil biology, hedgerow management, etc</p> <p>Changing climate allows diversification of crop type</p>	<p>Livestock production and emissions of GHG's remain strongly coupled</p> <p>Ammonia emissions in breach of targets set</p> <p>Inappropriate land-use/soil management</p> <p>Carbon sequestration capacity may actually be inhibited by currently employed grassland management practices</p> <p>Increased frequency and intensity of extreme climatic events</p> <p>Increased disease and pest pressures</p> <p>Capital investment costs, and lack of support for renewable energy projects.</p> <p>Absence of Feed-In Tariff.</p> <p>TAMS supports largely aimed at supporting more livestock, not adding value.</p> <p>Continued coupling of many agri-environmental schemes to stock numbers (e.g. BDGP, Sheep Welfare, BEEP)</p>
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Objective 5

Foster sustainable development and efficient management of natural resources such as water, soil and air

<p>STRENGTHS</p> <p>Livestock production systems that can be retuned to work closely with Nature</p> <p>Min Till/Zero Till System for arable production, if being developed</p> <p>Use of Cover Crops has begun.</p> <p>Agroforestry is beginning.</p> <p>Permanent Pasture when it is permanent</p> <p>Organic Farming practices are well known</p> <p>The rise of regenerative farming offers farmers the chance to farm in a manner that efficiently uses natural resources.</p>	<p>WEAKNESSES</p> <p>Increase in livestock numbers</p> <p>Increase in chemical fertiliser sales</p> <p>Impact of agricultural activity on water quality</p> <p>Increasing area under Nitrates derogation</p> <p>Promotion of high N-using ryegrass swards</p> <p>Sub-optimal soil fertility</p> <p>Ongoing drainage of organic soils (grasslands and wetlands)</p> <p>Ongoing drainage of peatlands</p> <p>No legislation in place regarding the protection of soil</p> <p>No proper legislation in place regarding the protection of hedgerows and trees.</p>
<p>OPPORTUNITIES</p> <p>Incentivise farming, such as organic farming, that is less reliant on resource-hungry, often polluting, farm inputs.</p> <p>Incentivise regenerative farming models.</p> <p>Thus, reduce fertiliser application</p> <p>This, reduce nitrogen and ammonia emissions</p> <p>Improve on-farm slurry management</p> <p>Look at animal housing alternatives</p> <p>Better Management of Peatlands</p> <p>Improved soil management and fertility</p>	<p>THREATS</p> <p>Deterioration in water quality (eutrophication, slurry spills)</p> <p>Deterioration in in air quality (ammonia)</p> <p>Deterioration in soil quality (compaction, loss of organic matter)</p> <p>Changing climatic conditions</p> <p>Continued depletion of peatlands</p> <p>Absence of legislation for the protection of natural heritage</p>

<p>Foster a greater understanding of environmental issues at farm level</p> <p>Increased afforestation and agroforestry</p> <p>Results based Agri-Environmental Schemes</p>	
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Objective 6

Contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes

<p>STRENGTHS</p> <p>Ireland has a network of Natura 2000 sites corresponding to 13% of the area</p> <p>High percentage of extensive grazing in West of Ireland</p> <p>An estimated 2.1 million hectares has the potential to be managed as High Nature Value farmland</p> <p>Hedgerows, trees and existing intact peatlands</p>	<p>WEAKNESSES</p> <p>Majority of habitats have an unfavourable status</p> <p>Farmland bird species are in decline</p> <p>Insect species are in decline</p> <p>Reliance on animal health products that may be detrimental to soil biome health and hence all farmland biodiversity food chains</p> <p>Woodlands are deemed to be in bad but stable status</p> <p>Grassland habitats have undergone significant losses over last 10-15 years</p> <p>Ongoing drainage of peatlands</p> <p>Area payments penalise overgrown hedges, scrub, wetlands</p> <p>Absence of mixed species forestry</p> <p>Lack of economic value attributed to public goods provided by non-productive land</p> <p>Absence of training on biodiversity and hedgerow management for farmers and contractors.</p>
<p>OPPORTUNITIES</p> <p>Incentivise the provision of ecosystem services including HNV farming</p> <p>Increase number of Natural 2000 sites</p> <p>Enhance biodiversity and establish new habitats on more intensive farms</p>	<p>THREATS</p> <p>Climate Change</p> <p>Habitat loss due to changes in land uses</p> <p>Reduction in pollinator species</p> <p>Overgrazing of habitats</p> <p>Agriculture intensification</p>

<p>Appropriate management of forests and increase afforestation levels (particularly mixed forestry) Use management practices which promote the concept of biodiversity-based farming</p> <p>Incentivise low input farming such as organic farming</p> <p>Combat invasive species</p> <p>Foster a greater understanding of environmental issues at farm level</p> <p>Engage the wider community in biodiversity related initiatives</p> <p>Proper management of peatlands, including rewetting and restoration of drained areas</p>	<p>Under grazing or land abandonment</p> <p>Agricultural activities impact on the environment</p> <p>Increase in invasive species – animal and plant</p> <p>Slowdown in generational renewal could affect uptake of environmentally friendly practises</p>
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Objective 7

Attract young farmers and facilitate business development in rural areas

<p>STRENGTHS</p> <p>Taxation supports for young farmers</p> <p>Contribution of agri-food sector to rural economy</p> <p>Off farm employment opportunities</p> <p>Strong tourism sector</p>	<p>WEAKNESSES</p> <p>Young farmers account for only 6.1% of the total population of farm managers.</p> <p>Access to land for purchase</p> <p>Access to credit</p> <p>Limited supports for young farmers wanting to enter non-livestock-based systems.</p> <p>Lack of support for farmers who want to produce products for on-farm / local processing and for selling direct to consumers.</p> <p>The failure to recognize that farming has to be interesting and attractive and that may mean being a food-product producer rather than a commodity producer.</p>
<p>OPPORTUNITIES</p> <p>Continue to increase rates of full and basic training for young farmers.</p> <p>Access to digital technologies</p> <p>Develop career pathways in agriculture</p> <p>Develop tourism industry in rural areas in a sustainable way</p> <p>Increase employment rates, and expand employment options in rural areas</p> <p>Increase opportunities for rural female entrepreneurs</p> <p>Agri-tourism</p>	<p>THREATS</p> <p>Income volatility in certain sectors</p> <p>Reduction in existing young farmer supports</p> <p>Decline in young farmer numbers</p> <p>Increased disillusionment with farming sector</p> <p>Absence of diversity with farming sector – not all young farmers want to milk cows.</p> <p>Current education syllabi may not match future needs for low-carbon, nature-friendly farming practices.</p>

Objective 8

Promote employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry

STRENGTHS	WEAKNESSES
<p>Dedicated Government Department for Rural Development</p> <p>Active social farming groups</p> <p>Strong tourism sector in some parts</p>	<p>Current routes to market are highly centralised and often not rural based</p> <p>Commodity-focused thinking ignores the opportunities for local communities and farms to add value to their own locally produced raw materials. It does not create employment.</p> <p>Bioeconomy products may still be highly extractive of farming resources and/or reliant on the use of unsustainable farm inputs</p> <p>Number of social groups at risk of social exclusion, isolation and poverty deprivation</p> <p>Low levels of women working in agriculture</p> <p>Lack of diverse employment opportunities in rural areas compared to large urban centres</p> <p>Shutting down of local services such as post offices and garda stations.</p> <p>High rate of vacant and derelict sites in many rural towns and villages</p> <p>Overly commercialised nature of forestry sector</p> <p>Overreliance on single species, clear fell model of forestry</p> <p>Lack of diversity within forestry sector for supporting public amenities.</p> <p>Poor rural broadband.</p>

OPPORTUNITIES	THREATS
<p>Building capacities of communities (enabling and supporting rural communities)</p> <p>Develop tourism industry in more parts of rural Ireland. Link tourism to local foods</p> <p>Improve availability of, and access to, necessary services in rural areas</p> <p>Increase employment rates, and expand employment options in rural areas through resilient and diverse models of agriculture.</p> <p>Increase opportunities for rural female entrepreneurs and farmers.</p> <p>Improve rural broadband.</p> <p>Provision of renewable energy sources, including through community-based schemes</p> <p>Increase afforestation rates with greater diversity of tree species, and more flexible planting options.</p> <p>Increase opportunities for diversification of farm enterprise</p> <p>Increased market opportunities for wood particularly in the construction, and carpentry sectors.</p> <p>Increase the participation in allotment growing, small holdings and social farming.</p>	<p>Demographic profile and the need for generational renewal</p> <p>Lower levels of services and over reliance on traditional employment options</p> <p>Climate Change – economic, social and environmental impacts</p> <p>Rural isolation, with a particular recognition of its impact on mental health</p> <p>Not maximising opportunities presented by digital economy Brexit</p> <p>Absence of resilience in Forestry due to overreliance on largely single species plantations, and emerging plant pests and diseases.</p>

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

STRENGTHS	WEAKNESSES
<p>National Plan on Antimicrobial Resistance (AMR)</p> <p>Antibiotics usage in Ireland is below the EU average, but still too high.</p> <p>National Plan on the Sustainable use of Pesticides</p> <p>National Farmed Animal Health Strategy</p> <p>Animal Welfare Strategy</p> <p>A producer of nutrient-dense foods</p>	<p>Increased sales of antibiotics</p> <p>Routine use of broad-spectrum anthelmintics and antibiotics as opposed to a responsible treatment-based approach.</p> <p>Low level of understanding of AMR development and its transmission</p> <p>Lack of available systems to monitor usage of antibiotics/anthelmintics</p> <p>Low level of organic farming in Ireland</p> <p>Reliance on imports of certain animal feeds</p> <p>Lack of coherent approach to bio security measures</p> <p>Lack of accurate data on food waste</p> <p>High use of anthelmintics</p>
OPPORTUNITIES	THREATS
<p>Development of database to monitor antibiotic usage</p> <p>Increasing consumer demand for Organic produce / sustainably produced food</p> <p>Development of mixed sward pastures, some of which have been shown to have anthelmintic properties.</p> <p>Increasing consumer demand / awareness for provenance of food vis a vis safety and health and welfare of animals</p> <p>Bonus scheme for 'zero movement cattle' i.e. cattle born, reared and finished on one farm.</p>	<p>Increased resistance to antibiotics and anthelmintics</p> <p>Increased levels of intensive farming and demand for cheap food.</p> <p>Any reduction in animal welfare standards</p> <p>Climate change</p> <p>New and emerging diseases</p>

Concluding Comments

The way we farm and the way we organise our food systems has a direct impact on natural resources, including land, seeds, livestock, water, biodiversity, and our collective knowledge.

The latter now tells us that we must focus on boosting biodiversity and natural ecological processes to produce our food. We need to make them work for farmers. And farmers must, again, learn to work with Nature, not against it. At the core must be living soils coupled with biologically abundant, diverse agroecosystems. It is only they that will develop and maintain long-term fertility and ensure that we always have productive food systems. Such food [eco]systems must be resilient ecosystems to both adapt to and mitigate climate change.

Crucially, the food systems of the future must provide greater autonomy and independence to farmers, food chain participants and rural communities. They need to become less dependent on bought inputs, often non-renewable inputs, and debt. They must also be less exposed to volatile global commodity markets. Product and market diversity must ensure that they are not unduly exposed to market shocks such as Brexit or adverse trade agreements.

Brexit itself will decrease the available CAP budget, whilst increasing the challenges rural areas and farmers are facing. It is a crisis, but only one of many that Irish farming has faced in recent years. Brexit is only another illustration of why we cannot afford any further delay in making the transition to a socially and environmentally sustainable farming and food systems.

Business as usual is simply not an option. We need to use the funds currently earmarked for the CAP in a fundamentally different way, to move beyond the CAP as it is and to support farmers and consumers in the transition to a fully sustainable food production model.