



## **SWOT analysis for the CAP Strategic Plan post 2020**

### **Introduction**

Outlined below is the submission from the Irish Natura & Hill Farmers Association relating to CAP Strategic Plan post 2020. In assessing the SWOT analysis compiled by the Department of Agriculture Food & the Marine we have decided to make direct proposals/comments relating to each of the nine objectives rather than the SWOT analysis suggested. In doing so we feel that direct comment can better reflect the views of our members as developed through an extensive consultation process with them over the last eighteen months.

In the comments made we have tried to be as brief as possible and we hope that you can accommodate this methodology and include it as part of Ireland's proposals towards the CAP Strategic Plan. If you need clarity on any of the points outlined please contact us through the office.

### **Objective 1**

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

The CAP through this objective needs to ensure all farmers are supported especially the smaller family farm. An opportunity to ensure the sustainability of this family farm model is to introduce a capping of individual direct payments (Pillar 1) at €60,000. The funding generated from this can then be redistributed on a front loaded payment model on the first 20 or possibly 32ha. This in addition to 100% convergence of payments through this CAP Programme can deliver for the smaller family farm.

A further opportunity exists to ensure the resilience of the suckler cow and sheep sectors and enhance food security across the European Union through the use of a coupled income support. Such interventions are catered for in Section 3(1) Article 29 of the CAP Legislative proposals. This option (which at its maximum would amount to 10%) should be kept open in the event of an under funded Pillar 2 where funding for these two sectors may not be forthcoming.



## **Objective 2**

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

This objective cannot be just focused on farmers. While clearly there is a major role that farmers need to engage in, business that support and depend on agricultural produce needs to be included through this objective.

## **Objective 3**

### **Improve the farmer's position in the value chain**

Farmers need to have some input in the value chain and this can only be done by having diverse markets and through production groups and collective bargaining with processors and co-ops.

## **Objective 4**

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

Many farmers especially on our hills and on the high nature value farmlands are making a significant contribution to climate change mitigation but we need to ensure this is contribution is recognised. Current proposals in Pillar 1 around carbon rich soils could leave farmers with these land types carrying an unfair burden through increased GAEC compliance. It is vital that increased conditionality attached to carbon rich soils does not affect the ability of farmers farming these environmentally sensitive lands to include these areas for supports under proposed interventions such as the eco-scheme or coupled payments in pillar 1 and ANC or welfare and environmental interventions in Pillar 2

A process needs to be established that measures the carbon footprint of each farm and rewards farmers that are carbon neutral and especially farmers with land that is sequestering more carbon than their farming system is emitting.

In relation to the proposed Eco scheme we believe that like the current Greening payment this should comprise of 30% of the Pillar 1 budget. However payment on this should be equal for all farmers specific to the measure, unlike the Greening payment which saw a major variation in payment rates specific to the measure.



### **Objective 5**

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

Currently the majority of the farmers that we represent are doing this already through a low input system that ensures the efficient management of our natural resources while producing a high quality farm product i.e. lamb and beef. This production model needs to be supported through a direct payment that reflects the value of what farmers are delivering and through marketing supports that highlights this production system.

### **Objective 6**

#### **Contribute to the protection of biodiversity, enhanced ecosystem services and preserve habitats and landscapes**

The Natura 2000 designations were implemented to deliver on this objective. Through this almost 14% of the country has a Natura 2000 designation which has restricted farmer's agricultural activity through the 39 actions requiring consent.

While these farmers are willing to work in delivering on this objective both the EU and the Member States needs to acknowledge the impact and burden of these designations. Farmers and landowners are at a major loss, both in real terms and on future potential earnings which needs to be recognised and reimbursed. As these are an EU designation we are of the opinion that payment for their burden should be made from the EU through the CAP Program and is allowed for under Article 67 of the EU Commissions CAP Legislative Proposal

### **Objective 7**

#### **Attract young farmers and facilitate business development in rural areas**

Successive CAP Programmes have sought to address the issue of generational renewal and the ever decreasing number of young people coming into farming. As an organisation we are supportive of the current measure in place to support young farmers through the National Reserve and the Young Farmer Scheme. We see merit in both schemes being part of the new CAP Programme.



However in order to encourage young farmers into agriculture we need to ensure the industry is attractive in terms of return. This is a major issue where extensive farming systems are more prevalent which is why we need a fairer redistribution of CAP payments as we have outlined in objective 1.

With regard to the development of rural areas there is potential to increase tourism potential especially on our hills. However this needs to be done in association with farmers and ensure that they benefit directly from this.

### **Objective 8**

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

In many parts of rural Ireland part time farming is the norm which is why we need to ensure employment opportunities in all rural areas. Government and EU policy has a major impact in delivering this through direct support and policy. Unfortunately policy from both EU and National level has often discriminated against rural areas especially in relation to road infrastructure, transport costs and housing. These policies have often been used by various NGO Groups to further undermine rural development and rural communities – this is why all policy from both EU and National level needs to be rural proofed.

Ireland's forestry policy as currently operated needs to change. This change needs to see a move away from the currently favoured sitka spruce monoculture to a native woodland model. There is also the opportunity to develop an improved agro-forestry programme which can help in sustaining communities and deliver for many farmers in terms of meeting their climate change obligations.

### **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**

The dramatic increase in the dairy herd in recent years is a cause for concern. This expansion is coming at the expense of other sectors and in our opinion is a case of putting all our eggs in one basket. Currently out of a total of 137,000 farmers only 18,000 are dairy farmers which is why we need to ensure all other sectors get their fair share of support,



whether that be direct support through CAP or advice and technical assistance from Teagasc.

Market demands are changing – there is an increase in the number of vegans and this will continue. There is also increased awareness of our food production systems which can benefit Ireland especially our extensive farming systems. These systems can deliver a quality product in the form of naturally reared beef and a lamb product marketed on the back of the ‘Wild Atlantic Way’ brand. Products such as these can obtain a higher price due to the low carbon input and their unique rearing system that also enhances biodiversity.

---