



**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**

• Details:

Full Name: Dr. Ciara Murphy

Organisation where applicable: Jesuit Centre for Faith and Justice

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 checked="" type="checkbox"/>

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

• 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  
Please use a separate template for each objective

<b>Objective 4 – Contribute to climate change mitigation and adaptation, as well as sustainable energy</b>	
<p><b>Strength</b></p> <ul style="list-style-type: none"> <li>• With the national herd size growing, there is a large availability of feedstock and agricultural residues for bioenergy production</li> <li>• Compared to other EU countries, there is a significant national cover of hedgerows, individual trees and non-forest woodlands.</li> <li>• The agriculture sector does have expressed aims to be carbon neutral regarding land use.<sup>1</sup></li> </ul>	<p><b>Weakness</b></p> <ul style="list-style-type: none"> <li>• Agri-environmental climate schemes in Ireland have been ineffective to date as the schemes have been designed to be accessible to as wide a range of farmers as possible.<sup>2</sup></li> <li>• Targets for agri-environmental schemes are linked to the uptake of the measures rather than linked to the quality of the management taking place or the outcomes achieved.<sup>3</sup></li> <li>• Preference for simple low-cost ways of allocating funding and implementing schemes to minimise administrative costs and avoid potential fines resulting from audit or compliance checks<sup>4</sup></li> <li>• No limits on inputs such as artificial nitrogen leading to increased GHG emissions.<sup>5</sup></li> <li>• Ireland’s current agriculture system lacks diversity making it more vulnerable to extreme weather conditions (e.g. recent fodder crisis, drought).</li> </ul>

<sup>1</sup> Gary J. Lanigan et al., ‘An Analysis of Abatement Potential of Greenhouse Gas Emissions in Irish Agriculture 2021-2030’, *Teagasc, Oak Park, Carlow. June 2018, 2018.*

<sup>2</sup> Kaley Hart and Faustine Bas-Defossez, ‘CAP 2021-27: Proposals for Increasing Its Environmental and Climate Ambition’ (Brussels: Institute for European Environmental Policy, November 2018).

<sup>3</sup> Yiyang Cao, ‘GLAS: Baseline Analysis of Famer Attitudes’ (Department of Agriculture, Food and the Marine, August 2018).

<sup>4</sup> Hart and Bas-Defossez, ‘CAP 2021-27: Proposals for Increasing Its Environmental and Climate Ambition’.

<sup>5</sup> ‘Are Teagasc’s Climate Mitigation Projections Credible? - The National Trust for Ireland - An Taisce’, accessed 11 October 2019, <http://www.antaisce.org/TeagascClimateCredibility>.

Opportunity	Threat
<ul style="list-style-type: none"> <li>• Development of an appropriate intervention logic in the allocation of funds to different measures according to identified needs.<sup>6</sup></li> <li>• Indicators identified to measure progress of agri-environmental schemes should be made more specific to enable the quality of the action taken to be determined as well as the quantity.</li> <li>• Ireland needs to set more detailed objectives at a national or regional level and then carry out more detailed monitoring on progress towards meeting these, using nationally available data.</li> <li>• Focus upon overall nitrogen-use reductions which will lead to the abolition of nitrogen derogation farms<sup>7</sup></li> <li>• Rethink dairy farming systems and ongoing expansion in the context of increasing environmental constraints<sup>8</sup></li> <li>• Establish energy-capture grants to both process slurry and to create energy<sup>9</sup></li> <li>• Grant aid for on-farm power generation for farm-use and as an income stream<sup>10</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Based on the Irish Government’s response to climate change, providing the DAFM with more flexibility to choose how to design and implement CAP measures will not necessarily lead to choices that enhance either the ambition or effectiveness in relation to the environmental and climate needs within Ireland.</li> <li>• A decentralised CAP may result in inactivity by the DAFM or the risk of undue influence by farm lobby or agri-processor groups.<sup>11</sup></li> <li>• Lack of ownership of the environmental and climate issues that should be addressed by the DAFM as the working relationship between the DACCE and the DAFM is not well developed<sup>12</sup></li> <li>• Agricultural intensification.</li> </ul>

<sup>6</sup> Hart and Bas-Defossez, ‘CAP 2021-27: Proposals for Increasing Its Environmental and Climate Ambition’.

<sup>7</sup> Stuart Meikle, ‘FARM 2 FORK 2030: A Truly Green Farming, Food and Rural Vision of Ireland’ (Regenerative Farming Ireland, September 2019).

<sup>8</sup> Meikle.

<sup>9</sup> Meikle.

<sup>10</sup> Meikle.

<sup>11</sup> Meikle.

<sup>12</sup> Hart and Bas-Defossez, ‘CAP 2021-27: Proposals for Increasing Its Environmental and Climate Ambition’.

**Objective 5 - Foster sustainable development and efficient management of natural resources such as water, soil and air**

**Strength**

- Peat soils comprise some 20.6% of Ireland's national land area. In addition to their biodiversity value, peatlands are also very important carbon sinks, and act as a buffer - like large sponges - helping to protect us from flooding.<sup>13</sup>
- Compared to other EU countries, there is a significant national cover of hedgerows, individual trees and non-forest woodlands.
- At present, there are low levels of soil erosion by water.

**Weakness**

- Agri-environmental climate schemes in Ireland have been ineffective to date as the schemes have been designed to be accessible to as wide a range of farmers as possible<sup>14</sup>
- Targets for agri-environmental schemes are linked to the uptake of the measures rather than linked to the quality of the management taking place or the outcomes achieved.<sup>15</sup>
- Preference for simple low-cost ways of allocating funding and implementing schemes to minimise administrative costs and avoid potential fines resulting from audit or compliance checks<sup>16</sup>
- Lack of monitoring and compliance with current environmental schemes such as GLAS – Green, Low Carbon, Agri-Environment Scheme.
- No limits on inputs such as artificial nitrogen leading to increased GHG emissions.<sup>17</sup>
- Low percentage of native woodland cover.<sup>18</sup>
- Agri-environment schemes have failed to deliver sufficient protection for Ireland's water bodies.<sup>19</sup>
- No legislation in place regarding the protection of soil.
- Agricultural training actively encourages practices that diminish soil quality (e.g. artificial fertiliser, pesticide and herbicide use).<sup>20</sup>

<sup>13</sup> 'Ireland's Peatlands - The National Trust for Ireland - An Taisce', accessed 11 October 2019, <http://www.antaisce.org/issues/irelands-peatlands>.

<sup>14</sup> Hart and Bas-Defosse, 'CAP 2021-27: Proposals for Increasing Its Environmental and Climate Ambition'.

<sup>15</sup> Cao, 'GLAS: Baseline Analysis of Famer Attitudes'.

<sup>16</sup> Hart and Bas-Defosse, 'CAP 2021-27: Proposals for Increasing Its Environmental and Climate Ambition'.

<sup>17</sup> 'Are Teagasc's Climate Mitigation Projections Credible? - The National Trust for Ireland - An Taisce'.

<sup>18</sup> 'Native Woodlands', Forestry Focus, accessed 11 October 2019, <https://www.forestryfocus.ie/social-environmental-aspects/biodiversity-and-nature-conservation/biodiversity-in-forests/conservation-and-restoration/>.

<sup>19</sup> 'Swan Ireland – Agriculture', accessed 11 October 2019, <http://www.swanireland.ie/threats-to-our-waters/agriculture>.

<sup>20</sup> '2019 - Green Cert Options - Teagasc | Agriculture and Food Development Authority', accessed 11 October 2019, <https://www.teagasc.ie/publications/2019/green-cert-options.php>.

Opportunity	Threat
<ul style="list-style-type: none"> <li>• Establish a practice of ecological assessments of individual farms/regions to allow site and context specific land management decision to be made.</li> <li>• Sustainable development and ecological management of resources such as water, soil and air should be core to all training e.g. Green Cert.</li> <li>• Review existing policies and their implementation to assess if policies need to be improved or just better implementation and enforcement.</li> <li>• Well-designed, agri-environment schemes can help deliver important public goods in the form of clean water, clean air, carbon sequestration, higher biodiversity, and long-term food security<sup>21</sup></li> <li>• Development of an environment-first intervention logic in the allocation of funds to different measures according to identified needs.<sup>22</sup></li> <li>• Indicators identified to measure progress of agri-environmental schemes should be made more specific to enable the quality of the action taken to be determined as well as the quantity.</li> <li>• Ireland needs to set more detailed objectives at a national or regional level and then carry out more detailed monitoring on progress towards meeting these, using nationally available data.</li> <li>• Targeted, outcome-based agri-environment schemes which are integrated at a regional scale which are strongly supported by research and practice elsewhere in Europe.<sup>23</sup></li> </ul>	<ul style="list-style-type: none"> <li>• The Wildlife Amendment Act, if passed would allow revocation of natural heritage area orders resulting in removal of legislative protection for bogland potentially resulting in inappropriate land use/ management.<sup>24</sup></li> <li>• Inappropriate afforestation e.g. plantations in peatlands.<sup>25</sup></li> <li>• Increased afforestation with non-native tree species.<sup>26</sup></li> <li>• Based on the Irish Government’s response to climate change, providing the DAFM with more flexibility to choose how to design and implement CAP measures will not necessarily lead to choices that enhance either the ambition or effectiveness in relation to the environmental and climate needs within Ireland.</li> <li>• Lack of ownership of the environmental and climate issues that should be addressed by the DAFM as the working relationship between the DACCE and the DAFM is not well developed<sup>27</sup></li> </ul>

<sup>21</sup> ‘CAP Reform - The National Trust for Ireland - An Taisce’, accessed 7 October 2019, <http://www.antaisce.org/issues/cap-reform>.

<sup>22</sup> Hart and Bas-Defossez, ‘CAP 2021-27: Proposals for Increasing Its Environmental and Climate Ambition’.

<sup>23</sup> ‘CAP Reform - The National Trust for Ireland - An Taisce’.

<sup>24</sup> Houses of the Oireachtas, ‘Wildlife (Amendment) Bill 2016 – No. 77 of 2016 – Houses of the Oireachtas’, text, 21 July 2016, <https://www.oireachtas.ie/en/bills/bill/2016/77>.

<sup>25</sup> Shauna Bowers, ‘More than Half a Million Trees to Be Planted on Former Boglands’, The Irish Times, accessed 11 October 2019, <https://www.irishtimes.com/news/environment/more-than-half-a-million-trees-to-be-planted-on-former-boglands-1.4038120>.

<sup>26</sup> ‘Afforestation - Teagasc | Agriculture and Food Development Authority’, accessed 11 October 2019, <https://www.teagasc.ie/crops/forestry/grants/establishment-grants/afforestation/>.

<sup>27</sup> Hart and Bas-Defossez, ‘CAP 2021-27: Proposals for Increasing Its Environmental and Climate Ambition’.

<b>Objective 6 - Contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes</b>	
<p><b>Strength</b></p> <ul style="list-style-type: none"> <li>• The ‘Farmland biodiversity agricultural ecology’ sub-programme is focussed on developing the scientific knowledge base required to underpin policy and farming activity that will contribute to conservation of farmland biodiversity and ecological resources.<sup>28</sup></li> <li>• Huge potential for land to be farmed as high nature value farmland.<sup>29</sup></li> <li>• Peat soils comprise some 20.6% of Ireland’s national land area. In addition to their biodiversity value, peatlands are also very important carbon sinks, and act as a buffer - like large sponges - helping to protect us from flooding.<sup>30</sup></li> <li>• Compared to other EU countries, there is a significant national cover of hedgerows, individual trees and non-forest woodlands.</li> </ul>	<p><b>Weakness</b></p> <ul style="list-style-type: none"> <li>• Lack of monitoring and compliance with current environmental schemes such as GLAS – Green, Low Carbon, Agri-Environment Scheme<sup>31</sup></li> <li>• ‘Unworked’ farmland is converted to farmland which is eligible for subsidies leading to an incentive to destroy areas of ecological value<sup>32</sup></li> <li>• Agri-environment schemes have failed to deliver sufficient protection for Ireland’s biodiversity and have not ensured that ecosystems can support a vibrant agricultural sector in the long term.<sup>33</sup></li> <li>• Current agri-training programmes have poor emphasis on biodiversity and ecosystem services.<sup>34</sup></li> </ul>
<p><b>Opportunity</b></p> <ul style="list-style-type: none"> <li>• Targeted, outcome-based agri-environment schemes which are integrated at a regional scale which are strongly supported by research and practice elsewhere in Europe.<sup>35</sup></li> <li>• Restore the lost biodiversity to within/on/above dairy’s farmland, not just at its margins<sup>36</sup></li> <li>• Support organic / regenerative farming change-over with tapered payments<sup>37</sup></li> </ul>	<p><b>Threat</b></p> <ul style="list-style-type: none"> <li>• Based on the Irish Government’s response to climate change, providing the DAFM with more flexibility to choose how to design and implement CAP measures will not necessarily lead to choices that enhance either the ambition or effectiveness in relation to the environmental and climate needs within Ireland.</li> <li>• Lack of ownership of the environmental and climate issues that should be addressed by the DAFM as the working</li> </ul>

<sup>28</sup> ‘Research - Teagasc | Agriculture and Food Development Authority’, accessed 11 October 2019, <https://www.teagasc.ie/environment/biodiversity--countryside/research/>.

<sup>29</sup> ‘Whole HNV Farmland’, *High Nature Value Farmland* (blog), accessed 11 October 2019, <http://www.high-nature-value-farmland.ie/whole-hnv/>.

<sup>30</sup> ‘Ireland’s Peatlands - The National Trust for Ireland - An Taisce’.

<sup>31</sup> ‘CAP Reform - The National Trust for Ireland - An Taisce’.

<sup>32</sup> ‘CAP Reform - The National Trust for Ireland - An Taisce’.

<sup>33</sup> ‘CAP Reform - The National Trust for Ireland - An Taisce’.

<sup>34</sup> ‘2019 - Green Cert Options - Teagasc | Agriculture and Food Development Authority’.

<sup>35</sup> ‘CAP Reform - The National Trust for Ireland - An Taisce’.

<sup>36</sup> Meikle, ‘FARM 2 FORK 2030: A Truly Green Farming, Food and Rural Vision of Ireland’.

<sup>37</sup> Meikle.

<ul style="list-style-type: none"> <li>• Offer grants to reseed ‘improved’ pasture with highly diverse seeds mixtures<sup>38</sup></li> <li>• Use ecological payments to promote hedgerows for both grazing and shelter<sup>39</sup></li> <li>• Provide capital grants for housing systems that produce compost or manure<sup>40</sup></li> <li>• Foster a greater understanding of environmental issues at farm level by ensuring is core to all training and education courses.<sup>41</sup></li> <li>• Establish a practice of ecological assessments of individual farms/regions to allow site and context specific land management decision to be made.</li> </ul>	<p>relationship between the DACCE and the DAFM is not well developed</p> <ul style="list-style-type: none"> <li>• The Wildlife Amendment Act, if passed would allow revocation of natural heritage area orders resulting in removal of legislative protection for bogland potentially resulting in inappropriate land use/ management.<sup>42</sup></li> </ul>
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<sup>38</sup> Meikle.

<sup>39</sup> Meikle.

<sup>40</sup> Meikle.

<sup>41</sup> ‘2019 - Green Cert Options - Teagasc | Agriculture and Food Development Authority’.

<sup>42</sup> Oireachtas, ‘Wildlife (Amendment) Bill 2016 – No. 77 of 2016 – Houses of the Oireachtas’.

<b>Objective 8 – Promote employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry</b>	
<p><b>Strength</b></p> <ul style="list-style-type: none"> <li>• There has been a dedicated Forestry Programme for Ireland since 2014.<sup>43</sup></li> <li>• Project Ireland 2040 has specific objectives focused on rural communities and economies.<sup>44</sup></li> <li>• Forestry programmes can have additional tourism benefits which can add value to the local community.</li> </ul>	<p><b>Weakness</b></p> <ul style="list-style-type: none"> <li>• Ireland only allocated about 20% of its CAP funds to its Rural Development Programme.<sup>45</sup></li> <li>• Timber outputs from Irish forests are produced to the detriment of soil, water and biodiversity quality.<sup>46</sup></li> <li>• Beef farming lacks profitability and predictable income for farmers due to market volatility.<sup>47</sup></li> <li>• Over reliance on unsustainable extractive industries in parts of Ireland.</li> <li>• Lack of diversity of produce in Irish agriculture system.</li> </ul>
<p><b>Opportunity</b></p> <ul style="list-style-type: none"> <li>• Indicators identified to measure progress against these should be made more specific to enable the quality of the action taken to be determined as well as the quantity of uptake of schemes.</li> <li>• Develop alternative markets farmers can supply to</li> <li>• Increase opportunities for diversification in agriculture enterprise including market gardens, community farming projects and orchards and other horticulture.</li> <li>• Create new designated origin products</li> </ul>	<p><b>Threat</b></p> <ul style="list-style-type: none"> <li>• Incentivising forestry and land management practices in unsuitable places.<sup>48</sup></li> <li>• Over reliance on meat and dairy production increases risk for the farmer in poor climatic conditions (e.g. fodder crisis, drought).</li> </ul>

<sup>43</sup> 'Forestry Programme 2014-2020: Ireland' (Forest Service, Department of Agriculture, Food and the Marine, 2014).

<sup>44</sup> 'Gov.ie - Project Ireland 2040', accessed 11 October 2019, <https://www.gov.ie/en/campaigns/09022006-project-ireland-2040/?referrer=/en/project-ireland-2040>.

<sup>45</sup> Meikle, 'FARM 2 FORK 2030: A Truly Green Farming, Food and Rural Vision of Ireland'.

<sup>46</sup> Mary Colwell, 'A Forestry Boom Is Turning Ireland into an Ecological Dead Zone | Mary Colwell', *The Guardian*, 10 October 2018, sec. Opinion, <https://www.theguardian.com/commentisfree/2018/oct/10/trees-ireland-biodiversity-sitka-birds-extinction>.

<sup>47</sup> Aisling Kiernan, 'Debt Now Averages €44,000 on Irish Beef Farms', *Agriland.ie*, 20 June 2019, <http://www.agriland.ie/farming-news/debt-now-averages-e44000-on-irish-beef-farms/>.

<sup>48</sup> Bowers, 'More than Half a Million Trees to Be Planted on Former Boglands'.

<b>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.</b>	
<p><b>Strength</b></p> <ul style="list-style-type: none"> <li>• Livestock on Irish farms have some of the lowest rates for antibiotic use in Europe which creates healthier animals.<sup>49</sup></li> <li>• Food production is guided by a broad range of strategy and action plans; National Plan on Antimicrobial Resistance, Sustainable Healthy Agri-Food Research Plan, National Farmed Animal Health Strategy.</li> </ul>	<p><b>Weakness</b></p> <ul style="list-style-type: none"> <li>• Live exports of surplus bull calves from dairy industry to Europe and finished beef animals for slaughter in Middle East and North Africa. Live exports of animals under 6 weeks has almost doubled from 2017 to 2019 with 158,000 young calves exported.<sup>50</sup></li> <li>• Lack of pathways to markets for farmers to reach consumers.</li> <li>• Reliance on imports for a large proportion of our fruit and vegetables.</li> <li>• Reliance on importing grain and concentrates for animal feed.<sup>51</sup></li> <li>• Lack of awareness of the importance of soil quality for food production.</li> <li>• Intensification results in poorer animal welfare standards.<sup>52</sup></li> </ul>
<p><b>Opportunity</b></p> <ul style="list-style-type: none"> <li>• Support beef-sector projects that will end live cattle exports [bar to the UK].<sup>53</sup></li> <li>• Integrate dairy and beef initiatives to improve the quality of dairy-bred beef.<sup>54</sup></li> <li>• Improve awareness of importance of diversification of food production, soil quality and reducing inputs by incorporating into Green Cert.<sup>55</sup></li> </ul>	<p><b>Threat</b></p> <ul style="list-style-type: none"> <li>• Continued expansion of live exports of surplus bull calves from dairy industry and finished beef animals for slaughter in Middle East and North Africa.</li> <li>• IFA is strongly of the view that Ireland needs a live export trade that has the capacity to export at least 400,000 animals annually.<sup>56</sup></li> <li>• IFA is of the view calf exports need to increase to 200,000 -250,000 head annually to accommodate the increase in the dairy herd.<sup>57</sup></li> <li>• Public support for current agricultural practices and dairy expansion will be damaged by the continued expansion</li> </ul>

<sup>49</sup> Friday, May 26, and 2017, 'Irish Livestock among Lowest in EU for Antibiotic Use', 26 May 2017, <https://www.irishexaminer.com/business/irish-livestock-among-lowest-in-eu-for-antibiotic-use-450950.html>.

<sup>50</sup> IFA, 'IFA Submission to the Joint Oireachtas Committee on Agriculture Food and the Marine on the Future of the Beef Sector', n.d.

<sup>51</sup> Siobhán Walsh, 'Where Are Animal Feed Imports Coming From?', Agriland.ie, 3 March 2019, <http://www.agriland.ie/farming-news/where-are-animal-feed-imports-coming-from/>.

<sup>52</sup> Ella McSweeney, 'We Need to Talk about Cow Welfare: What Does the Science Say?', The Irish Times, accessed 11 October 2019, <https://www.irishtimes.com/news/science/we-need-to-talk-about-cow-welfare-what-does-the-science-say-1.3444641>.

<sup>53</sup> Meikle, 'FARM 2 FORK 2030: A Truly Green Farming, Food and Rural Vision of Ireland'.

<sup>54</sup> Meikle.

<sup>55</sup> '2019 - Green Cert Options - Teagasc | Agriculture and Food Development Authority'.

<sup>56</sup> IFA, 'IFA Submission to the Joint Oireachtas Committee on Agriculture Food and the Marine on the Future of the Beef Sector'.

<sup>57</sup> IFA.

	<p>of live exports and the reluctance to ensure the highest standards of animal welfare.</p> <ul style="list-style-type: none"><li>• Consolidation of farms potentially resulting in more intensive farming practices.</li><li>• Farmers exiting industry due to unprofitability.<sup>58</sup></li></ul>
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<sup>58</sup> Kiernan, 'Debt Now Averages €44,000 on Irish Beef Farms'.