



Dan Curley, Chairman
10th of October 2019

Re: Current Public Consultations

SWOT Analysis for the CAP Strategic Plan post 2020

The current draft proposals will focus on nine specific objectives;

1. support viable farm income and resilience across the EU territory to enhance food security;
2. enhance market orientation and increase competitiveness including greater focus on research, technology and digitalisation;
3. Improve farmers' position in the value chain;
4. Contribute to climate change mitigation and adaptation, as well as sustainable energy;
5. Foster sustainable development and efficient management of natural resources such as water, soil and air;
6. Contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes;
7. Attract young farmers and facilitate business development in rural areas;
8. Promote employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry;
9. Improve the response of EU agriculture to societal demands on food and health, including safe, nutritious and sustainable food, as well as animal welfare.

Further to our previous submission to you on 'CAP post 2020' in March 2018, we will make our submission under your nine specific objective areas as follows;

The NARGC are coming from a user of the countryside perspective. We want good habitats, where wildlife flourishes in tandem with farming. We represent Gun Clubs and Hunt Clubs mainly.

1. Viable Farms and farming practices are very much part of the mix to keep the countryside vibrant and keeping rural Ireland alive. This latest buzz word 'Wilding' is precisely what Rural Ireland does not want. While wilding has never been fully explained, it is generally thought to mean leaving the ground completely to nature, with no farming been pursued at all, and the theory being that it will return to lovely native woodland.

This is naïve dangerous rubbish. It will cause depopulation of rural Ireland, and the land will become wasteland with scrub and invasive flora dominating, which will sustain practically no fauna other than predatory species, and further increase the already dominance of those predators in the Fauna balance. A complete disaster for rural Ireland and the Natural environment generally.

Ireland, particularly rural Ireland needs working farms, with a mosaic of habitats, and mixed farm uses. It is generally accepted now that type of farms we had prior to joining the EU fulfilled many needs, more so than what we have today. Irelands food security should be a national policy and priority, pursued and encouraged in a model to guarantee security always, rather than totally on market forces, particularly unit price.

The CAP incentives should be to encourage active farming, creating a mosaic of uses working side by side, for numerous benefits to all.

2. This objective is mainly for comment by those in the farming Industry, but Niche products produced exclusively with nature, should be marketed as premium natural products, and command higher returns for the producers.

3. Again this is for comment by those in the farming Industry, but the farmer / producer, must be known and trusted by the consumer, to build confidence in the origins of the product. This will become more important now with the advent of laboratory produced 'alternative' products. (See No. 9 in relation to 'Nature labelling')

4. This objective is key. The removal of hedges, trees, shrubbery from the Irish countryside since we joined the EU particularly, can only be categorized as systemised crimes against Nature. While it was done for alleged food production purposes mostly, it was folly in the extreme. This must be reversed immediately, and CAP incentives must be used to get this done at pace.

All Farms production units are been assessed for their carbon footprint, and they must be allowed offset their carbon footprint using Trees, Hedges, and any other Carbon absorption method, as mitigation against their production. A proper system of evaluation must also be devised that estimates carbon production versus carbon absorption, for each farm.

5. This type of assessment is very much farm specific, and the Natural elements, Water, Soil, Air, must be protected, that the transient elements leaving the farm are in as clean and good an environmental condition as possible. Again, CAP must be used to help farmers by advice and incentives, benefitting the common good.

6. Biodiversity loss, habitats and landscape loss, inextricably linked to No. 4 and 5 above, is the biggest negative in the Irish countryside over the last 50 years. The loss as outlined at No.4, combined with agriculture practices geared towards concentrated single product production, meant all the land use in vast areas of the countryside just produced high yielding grass / cereals to the exclusion of all other plants. Gone was the diversity of plants, colour, and insect life and all other life up the chain have taken the hit in equal proportions. There is strong evidence that the land is losing its productivity and is potentially a much greater threat to our existence than global warming.

Biodiversity must be part and parcel of every farm unit. While niche projects are good as examples of biodiversity, to make a difference every farm must be involved, and contribute to the biodiversity in their areas.

CAP must be used to drive and incentivise this.

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8. Not our areas, but it's a big part of keeping rural Ireland alive and vibrant.

9. Farmers farming with Nature must be rewarded better for their products, and this can only be achieved by a clear labelling of the source and the way the product was produced. All the elements of this objective come in under this banner. It should be a Nature 1 (completely with nature) to 10 or whatever number, indicating the degree of interventions used to produce the product. Obviously, products produced in laboratories, must be labelled clearly that they are not produced by natural methods. There is evidence that some processed foods have the potential to cause cancer and other human health issues, and people are entitled to know exactly what they are purchasing. Foods produced in laboratories should be scrutinised and tested to the same degree as any medicine or drugs are tested before they are allowed for human consumption.

CAP must be used to drive this agenda, because farmers rewarded proportionally for producing natural products will drive all the other eight objectives also.

We will complete the Swot analysis under the four assessment areas online also. This short summary of our thoughts on these nine areas which might be helpful to you, we hope.

Yours Truly,

Dan Curley, Chairman NARGC