



Irish Wildlife Trust  
8 Cabra Road,  
Dublin 7,  
D07T1W2

Department of Agriculture, Food and the Marine  
Agriculture House  
Kildare Street ,  
D02 WK12

December 8th 2021

**Irish Wildlife Trust submission to CAP Strategic Plan 2023-2027**

To Whom it May Concern,

The Irish Wildlife Trust (IWT) is a national, charitable, membership-based organisation which was established in 1979. Our goal is to raise awareness of our natural heritage and its benefits to people. We would like to make a submission for your consideration on the development of the CAP Strategic Plan 2023-2027.

Background

Ireland (and indeed the world in general) is in the midst of a two-pronged ecological emergency comprising an extinction crisis and a climate crisis. This was formally recognised by the Dáil in May of 2019.

Biodiversity is vanishing from across our land and sea at an unprecedented rate. Evidence for this can be found in a series of 'red list' reports from the National Parks and Wildlife Service (NPWS) which have found that across all groups of species analysed an average of one third of our native plants and animals are threatened with extinction or 'near threatened'. A number of species are either already extinct or their disappearance is imminent, such as the curlew, the great-yellow bumble bee and the freshwater pearl mussel.

Time and again it is highlighted that agriculture is the greatest threat to biodiversity. While recent expansion of the dairy industry has resulted in localised increases in water pollution, the impacts of our unsustainable food sector is felt much more widely. This includes the promotion of farm habitat removal due to the current rules on eligibility for the Single Farm Payment, the lack of any programme to promote good management of hedgerows, poor design of agri-environment schemes and degradation of upland peatlands and coastal habitats from free-roaming sheep. Even in lower intensity beef systems on potentially high nature value farmland, the use of artificial nitrogen has lowered grassland vegetation diversity and so has contributed to the collapse in insect populations. This has all been paid for by taxpayers under the Common Agricultural Policy (CAP).

The subsidies given to farmers since the formation of the CAP are a double-edged sword. While on the one hand they guarantee an income for food producers and help to supply a diverse, affordable and plentiful range of products for European consumers, they have also led to over-dependence, a stifling bureaucracy, perverse incentives resulting in ecological harm and income inequality.

The IWT is in favour of the transfer of public money to farmers on the principle of ‘public goods for public money’ but we object to public money being used to drive climate breakdown, pollution of air and water and the degradation of ecosystems. The negative impact of CAP has been well documented and debated. In 2017, when the public consultation on the CAP was held, a record 322,000 EU citizens responded and an overwhelming 85% said they wanted greater ambition in addressing environmental issues.

Ireland’s current CAP Strategic Plan (SP) however is not sufficiently ambitious to meet the challenge ahead. While there are some welcome changes on the previous (existing) CAP, it is very hard to see how ‘additionality’ is to be delivered at a scale that will meet already defined targets for greenhouse gas reductions, water quality and biodiversity restoration.

The European Commission, in its recommendations on Ireland’s CAP SP highlights the current difficulties<sup>1</sup>. It states that it is a “matter of urgency to halt the serious deterioration of Ireland’s peatlands” while increasing coverage of trees “has substantial potential for carbon sequestration, energy production and the support of ecosystems, provided the species mix is improved compared with recent trends”. Their report specifically recommends that Ireland’s CAP SP includes “support for carbon farming” through funded schemes to protect peatlands and encourage tree-planting. It highlights the need to “improve the conservation status of grasslands and heathlands”, pointing out the need to “prevent harmful burning of vegetation”.

In this submission we wish to focus on three specific areas: eligibility criteria, eco-schemes and agri-environmental schemes.

### 1. Eligibility

The need for all land to be in ‘good agricultural condition’ in order to receive the basic payment has resulted in unquantifiable destruction of habitats in Ireland over the last decade particularly wetlands and emerging native woodland (scrub). It has also promoted uncontrolled fires on upland peatlands. It is welcome that the draft CAP SP now includes for a 30% allowance for land parcels which are not in agricultural production. This has the potential to allow wetlands, flood plains and new native woodland to develop.

However, stopping at 30% severely limits the potential of this measure. In the coming years Ireland will develop a new Forest Strategy which is likely to aim for European-average levels of forest cover (30-40%, or 3-4 times existing levels). Simultaneously, turning farmed peatlands from carbon sources to carbon sinks over the next decade will require restoration of hydrology and natural vegetation to a large degree. Rewilding can help to achieve these aims, but it is essential that they are aligned with

---

<sup>1</sup> Commission recommendations for Ireland’s CAP strategic plan. SWD(2020) 377 final. Brussels, 18.12.2020

the CAP. Farmers should be allowed to claim for 100% of their landholding where forest, floodplain or peatland restoration is the aim.

It is welcome that commonages have been identified as ‘priority environmental assets’ and while rewilding all commonage areas may not be practical or desirable (e.g. where this would be contrary to other conservation aims) it should be an option for farmers elsewhere. If all commonages are to be subject to a results-based scheme, this should be reflected in the vegetation score cards. **It is essential that farmers are reassured that their payments will not be impacted for the presence of scrub on uplands** and indeed should be encouraged to remove grazing pressure (and in particular sheep) to allow for the recovery of vegetation. While low intensity grazing by cattle can be compatible with conservation of heath, we are not familiar with any projects that indicate free roaming sheep are compatible with protection of peatlands of any kind. It is essential that areas of blanket bog be destocked as grazing of any kind is not compatible with conservation – blanket bogs should be subject to strict protection and farmers should be rewarded for invasive species control, restoring hydrology, path maintenance etc.

## 2. Eco-schemes

The proposed eco-schemes are notable for their lack of ambition and are generalist measures that are not aligned with wider aims.

For example, given that many farmers are already moving to ‘multi-species swards’ to manage soil and reduce artificial fertiliser use, it is bizarre to be directing payments for this measure to cover a mere 6% of the land parcel. Measures such as crop diversification, soil sampling and reducing artificial fertiliser use are part of basic farm management so there is no ‘additionality’ in these measures. The planting of native trees, while always welcome, is very modest given the number of trees to be planted. There is no measure which acknowledges the poor condition of hedgerows and the need for better management practices to restore these important habitats.

We suggest the following be included as ecoschemes:

- Good hedgerow management – reward farmers for maintaining or restoring existing hedgerows.
- Flood plain restoration, e.g. through removal of embankments or restoration of natural river morphology
- Zero artificial fertiliser – maintaining grassland through regenerative techniques
- Native woodland establishment (an area-based target would be better metric than planting X number of trees).
- River/lake buffer zones of 30m
- Rewilding. A rewilding measure can combine elements of the above points to encourage land to be taken out of food production where there are clear environmental benefits – e.g. peatland restoration, protection forests, ancient woodland expansion (i.e. land that is directly adjacent to existing ‘ancient or long-established woodland’), flood plains and other wetland rehabilitation (e.g. ponds, marshes, and fens). Rewilding is not land abandonment, the removal of invasive or problem species (including deer), the reintroduction of

missing species, the restoration of hydrology, promoting (but controlling) public access etc. all require a form of land management.

### 3. Agri-environmental schemes

One of the great success stories in the last two decades has been the development of results-based schemes that have empowered farmers while directing activities towards desired outcomes. The general lack of results-based projects proposed in the CAP SP is a significant worry given their failure in the past (REPS, GLAS etc.). The Results Based Environment Agri Pilot Programme (REAP), which was over-subscribed by farmers, as well as the European Innovation Partnerships (EIPs) need to be the model for all agri-environmental payments. We could not find any mention of the REAP scheme in the CAP SP documents. Very little money is being devoted to these schemes when they need to be central to our approach. For example, the restoration of 'good ecological status' of freshwater pearl mussel populations is a requirement under the Habitats Directive for the rivers Barrow, Nore, Blackwater (Cork) and Slaney – all rivers which are under tremendous pollution pressure from dairy farming as well as other sources. These are large catchments where dedicated programmes are required to reduce pollution from agricultural sources.

We support the call by our colleagues in BirdWatch Ireland for a dedicated scheme to reverse the collapse of breeding wader populations.

The IWT has previously called for catchment-level modelling by the EPA, Teagasc and the NPWS so that targets for GHGs, water quality and biodiversity can be met in a coherent manner.

The climate and biodiversity crises present an enormous challenge. We are approaching tipping points where the collapse of ecosystems will not be reversible. On current trajectory, species such as the Curlew may go extinct before the end of the decade. We have an opportunity within the next cycle of the CAP to set a path towards renewal and regeneration. Ireland's draft CAP SP is missing this opportunity and this is a failure we simply cannot afford.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Pádraic Fogarty', with a stylized flourish at the end.

*Campaign Officer – Irish Wildlife Trust*