Submission on SEA Scoping report and AA Screening statement for AgriFood 2030 Strategy

A: SEA Scoping report:

1. SEA Process:
    a. Under S.I. Nos 435 & 436 of 2004 the relevant statutory authority must make available for public inspection a copy of its determination on the requirement for SEA for the strategy. Has this been undertaken?
    b. Under SEA Directive Article 3(6)/6(3) S.I. Nos 435 & 436 of 2004 it is required that designated environmental authorities must be consulted when deciding on the scope of the information to be included in the Environmental Report. We understand that the National Parks and Wildlife Service has not been consulted yet for their detailed input into the Scoping report. **This is a breach of the SEA Directive in our view.**
    c. We suggest that the SEA Check list produced by the EPA is reviewed by the consultants to ensure that there are no further breaches of EU law.
2. It is very concerning that the National Parks and Wildlife Service/Department of Heritage ecological assessment unit has not yet been formally consulted on the scoping for the SEA. This is extremely worrying and an error. The DAFM is legally obliged to consult with NPWS. **The Scoping report needs to be redone with the views of NPWS included and then the Scoping report must be recirculated to Stakeholders for their views**. In addition, the NPWS ecological assessment unit should also be consulted on the draft AA statement.
3. Section 1.3: Description of the AgriFood Sector "The agri-food sector is a key aspect of Ireland's economy, community and culture, exporting to at least 175 countries around the world and contributing a significant aspect of Ireland's global profile and reputation". The Agri-food sector including the primary production of meat and dairy are the most significant impacts on the environment in Ireland. This must also be mentioned.
4. Strategic Priorities section:
    a. The Bord Bia Consumer trends for 2020 also lists 'plant based' and 'plant protein', 'local provenance'[1] but these not listed in the priority 'Future food and beverages that meet consumer and societal expectations'
    b. There is no indication if the effects of Covid 19 have been factored in and assessed for impacts on the direction of the AgriFood Strategy. Bord Bia specialists have outlined that One of the sentiments that may be temporary but has consequences for producers and retailers now is around how consumers expect companies to behave towards staff and all areas of their supply chain. This ties in with Responsible Living. In our submission to the Environment Chapter of the AgriFood Strategy we highlighted the impacts to the mostly migrant workers working in meat processing plants in Ireland.
    In addition, analysis of the impacts of Covid 19 on consumer trends states: 'For a country which exports 90% of its food and drink, the danger of 'community protection' veering into nationalism and protectionism against imports is clear. In France and Italy we have already seen significant political sentiment moving towards 'buy French' and 'buy Italian' movements'.
    c. The primary producer has voiced his/her opinion in the AgriFood Strategy Survey for increased return to them in the form of prices they get for the food produced whereas the detail provided under Priority 3 seems to be going in the direction of

[1] https://www.bordbia.ie/industry/news/food-alerts/key-trends-in-health-and-wellness-for-2020/

assessing their viability and moving farmers on. Improving the competitiveness, productivity and viability of primary producers

   d. The fourth priority of 'Climate smart, environmentally sustainable agri-food sector, including consideration of air, climate, water, biodiversity and industry (origin green)' contains no detail on the direction of travel of the Strategy.

5. Plans to be considered incombination: The national biodiversity strategy, national pollinator plan, other biodiversity focused plans must be taken into account.
6. We do not support the tendency within the SEA to benchmark the status of Ireland's environment (e.g. water quality status) against the low bar of other EU countries. In particular in relation to water, the Water Framework Directive obliges **that Ireland's water bodies meet good ecological status and that there should be no deterioration in water quality status**. This is non-negotiable. The low bar of other EU countries is not the benchmark. **We request that the SEA and Environmental report refrain from this type of erroneous benchmarking.**
7. Related to point 5 and the general tone of underplaying the impacts of agriculture on the environment in Ireland the following statement has no place within the Scoping report or the final Environmental report. It states in the section on water 'Agricultural intensification is acknowledged as a contributor to localised water quality issues where they exist (pers comm. EPA)'. This downplays the science and the facts which are laid out in the following sections. This is unacceptable. Agriculture is the primary contributor to poor water quality.
8. Nature and Conservation section: No mention that SEA will consider the entire relevant list of Birds of Conservation Concern. This must include all farmland birds, waterbirds and relevant seabirds. Also please note that while a new Birds of Conservation Concern list will be published this Autumn, that several Irish Wildlife Manuals and reports have been published by the NPWS which provide updated information on Countryside Bird Survey, Wintering Waterbirds and seabirds. These must be reviewed and included in any assessment of agriculture impacts to species and the habitats that support them
9. pg 35 Section **Ecology and Nature Conservation:**
   a. Under the first bullet, it is an oversimplification to limit the impacts of agriculture to over grazing/undergrazing. The continued impacts of drainage is also substantial as is the increasing impact of pesticides and herbicides. For a full list of impacts please consult with the National Parks and Wildlife Service.
   b. "Lack of data on biodiversity and threats facing areas outside of protected areas". This is not entirely true. Surveys have been conducted for Curlew, Lapwing and other species in the wider countryside. A range of species have been studied around the country. These include … Small White Orchid in Leitrim. **We are concerned that insufficient attention and time is being given by the consultants to source all available data to be included in an assessment of such a far reaching a potentially detrimental policy on Ireland's biodiversity. Any lack of data underlines the need for application of the precautionary principle.**
10. **Pg 35 "Under the section Socio-economic;**
   a. Risk to reputation of Ireland as a food producing nation with strong environmental credentials"- this statement is incorrect, the risk rather is that there will be reputational damage to farmers due to Ireland's presentation of itself as having strong environmental credentials when this is not the case as Section C below highlights. Please see this report *Not So Green-debunking the Myths around Irish Agriculture*[2]
   b. The phrase 'over-intensification' needs to be defined. What is the threshold by which intensification has crossed to be overdone?
   c. The risk to SMEs, farmers and the environment due to extreme weather events and climate breakdown as well as the biodiversity crisis must also be considered in this

[2] https://www.stopclimatechaos.ie/assets/files/pdf/not_so_green.pdf

section. The cost of not reducing emissions including the fines that taxpayers may be asked to bear must be reflected. The cost of climate breakdown in terms of extreme weather events, fodder crises etc and the limits of the taxpayer to continue to pay out must also be considered.

d. The unequal beneficiaries of the CAP and agri- food sector must also be addressed. Smaller High Nature Value Farmers are not receiving the benefit for the ecosystem services that they are providing as part of the zero to low-input extensive grazing systems. Please see Section D below with the BirdWatch Ireland investigation into the distribution of environmental payments in the CAP.

11. Under the Section Historic Landscapes and Archaeology, there is reference to the impacts of 'extensive afforestation and exploitation of peatlands'. This impact must also be referenced in the section on Ecology as both these activities have had a detrimental impact on populations of wild birds including Annex 1 species[3]. In addition there have been several peer reviewed papers highlighting the impacts of afforestation on birds of conservation concern including Corkery et al 2020 listed in Section C below.
12. The Scoping report highlights the AgriFood Strategy consultation/survey undertaken in the Autumn of 2019. While the extremely supportive responses for biodiversity protection, addressing climate change and protecting water of the predominantly primary producers response, the responses to questions on Food Wise 2025 as presented by the consultants are selective. it states that "However, support was also expressed for continuation of the 2025 Food Wise priorities either in full or part". This statement is not substantiated by the public consultation response.
    a. 47% of respondents either disagreed or strongly disagreed that 'Food Wise 2025 is delivering on its vision of thriving producers and agri-food business'. **Only 18% either agreed or strongly agreed with this statement.**
    b. Environmental Sustainability and Human Capital were the highest ranked themes for the next AgriFood Strategy with 110 out of 212 respondents ranking environment as the most important theme- with a significant margin between it and the next ranked theme (43 points for Human Capital).
    c. Increased premiumisation of Irish agri-food products/higher value markets were the highest ranked element to support higher agri-food value.
13. In relation to Section 4.1 SEA Objectives for :
    a. Ecology and Nature Conservation, it states "Protect, enhance and manage Ireland's unique biodiversity assets". This needs to be rephrased not only to be in line with the Habitats Directive which is to Protect and Restore but also in line with the new EU Biodiversity Strategy. In fact what the Strategy must do is **'maintain and restore' habitats and species according to the Habitats Directive Article 1. The Strategy must also avoid deterioration of habitats as epr Article 6.2 of the Habitats Directive. This must be included. Suggested phrase for the Objective is "Protect, restore and support Ireland's unique biodiversity assets". The AgriFood Strategy must reflect this as must the Environmental Report. So the question to be asked is 'Will the Strategy maintain and restore habitats, species and sites'?**
    b. **Water: Suggest that the Objective is** Meet the Water Framework Directive requirements of **good ecological status by 2027 and that there should be no deterioration in water quality status**.
    c. Air Quality – The Objective must be … that Ireland meets the NECD thresholds and any other legal obligations that we have to protect air quality.
    d. Climate Change – The Objective must be … to cut absolute greenhouse gas emissions in line with national strategies and future carbon budgets.
14. In the Section on Alternatives, the consultants again cherry pick the AgriFood Strategy survey results to focus on continuation of the Food Wise 2025 ambition but without acknowledging that Food Wise has driven further declines in biodiversity. It is unacceptable that the SEA scoping continues to downplay the impacts of this and the previous agri-food strategies.

[3] https://birdwatchireland.ie/publications/birdwatch-ireland-2019-greening-irish-forestry-report/

15. **We propose the following alternative for consideration by the Consultants: 'That Ireland becomes a leader in organic farming and zero to low-fertilizer input High Nature Value farming garnering premium prices for farmers, and protecting our environment by paying farmers for ecosystem services they provide for all in Ireland and for generations to come'. This alternative is "realistic, capable of implementation and should fall within the legal and geographical competence of the authority concerned"[4].**
16. In section 3.14 of the Scoping report it states: "As indicated by the baseline section, a wealth of existing data exists about the state of Ireland's environment. This is necessarily focused on national or regional levels and therefore it is acknowledged that the large-scale trends discussed may not in every case fully represent sub-regional circumstances. The information available does not allow for the specific effects of the predecessor strategies to be isolated from the observed general trends, this is therefore identified as an information gap for the SEA process." This statement again seeks to remove responsibility from FoodWise and its implementation through the CAP for the downward spiral of environmental quality in Ireland. Agriculture as supported by Food Harvest 2020 and FoodWise 2025 is the leading pressure and threat on biodiversity, water and greenhouse gas emissions in Ireland and this is fact according to the EPA and the NPWS. **The cumulative impacts of these two strategies and the third national agri-food strategy must be undertaken.**

B: AA Screening report by ADAS:

1. We are very concerned with the gaps in the AA screening statement and that it is not at sufficiently high quality. Normally AA documentation in Ireland includes the declaration of competence of those undertaking the AA screening. This has not been provided and is a gap. It must be included in the actual AA report.
2. There is insufficient mention or regard in the AA screening statement of the impacts of fisheries and aquaculture policy on coastal and marine habitats and species. This must be corrected.
3. We are very concerned with the proposed 'limited and limiting' approach of the consultants in their AA screening assessment to focus only on species already under pressure. This is not appropriate. As per ECJ jurisprudence: "**The assessment carried out under that provision may not have lacunae and must contain complete, precise and definitive findings and conclusions capable of dispelling all reasonable scientific doubt as to the effects of the proposed works on the protected area concerned** (judgment of 25 July 2018, *Grace and Sweetman*, C‑164/17, EU:C:2018:593, paragraph 39 and the case-law cited). We are concerned that time limitations have been pressed on the consultants and that the outcome of the assessment will not be adequate, complete or be based on precise and definitive findings as per European Court of Justice rulings.

   In addition: Case C‑461/17, states that "In order for the integrity of a site as a natural habitat not to be adversely affected for the purposes of the second sentence of Article 6(3) of the Habitats Directive, **the site needs to be preserved at a favourable conservation status; this entails the lasting preservation of the constitutive characteristics of the site concerned that are connected to the presence of a natural habitat type whose preservation was the objective justifying the designation of that site in the list of sites of Community** importance, in accordance with that directive (judgment of 17 April 2018, *Commission* v *Poland(Białowieża Forest)*, C‑441/17, EU:C:2018:255, paragraph 116 and the case-law cited).

   The Holohan ruling (Case C‑461/17,) goes on to say "Since, as stated in paragraphs 33 and 34 of the present judgment, all aspects which might affect those objectives must be identified and since the assessment carried out must contain complete, precise and definitive findings in that regard, it must be held that all the habitats and species for which

[4] EPA (2008) SEA Process Checklist available here http://www.epa.ie/pubs/advice/ea/seaprocesschecklist.html

the site is protected must be catalogued. A failure, in that assessment, to identify the entirety of the habitats and species for which the site has been listed would be to disregard the abovementioned requirements and, therefore, as observed, in essence, by the Advocate General in point 31 of her Opinion, would not be sufficient to dispel all reasonable scientific doubt as to the absence of adverse effects on the integrity of the protected site (see, to that effect, judgment of 26 April 2017, *Commission* v *Germany*, C‑142/16, EU:C:2017:301, paragraph 33).

AND As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, it must be recalled that the Habitats Directive, as follows from the wording of Article 6(3) of that directive, subjects '[a]ny plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon' to the environmental protection mechanism of that provision. In that regard, as stated by the Advocate General in points 43 and 48 of her Opinion, the conservation objective pursued by the Habitats Directive, recalled in paragraph 35 of the present judgment, **entails that typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area.**

The rationale of the consultants to focus species only currently impacted by agriculture must be in line with EU law. This rationale, if pursued, must be substantiated and references should be provided for the proposal to focus on county wide scale of conservation interests in the Appropriate Assessment and not at a national scale. Cumulative and incombination impacts must also then be considered.

In addition, and in particular, bird species and other important wildlife, not listed as conservation interests but are typical of the site must be included in the appropriate assessment. **We suggest therefore that all Birds of Conservation Concern[5] be included in the assessment.**

4. The AA screening report mentions ammonia from pig and poultry operations and fails to mention beef and dairy operations. Yet the SEA scoping report says 'Ammonia concentrations were found to be higher in areas with higher agricultural intensity such as the north-east midlands and the south-east of the country'. The south east of the country is not known for its pig and poultry operations.
5. It is critical that conservation interests such as Annex 1 and red listed species are dependent on a range of habitat types during their life cycle. For example Hen Harrier is dependent on habitats both within and outside the SPA. The draft Hen Harrier Threat Response Plan must be reviewed as part of the AA. Approximately 50% of Hen harriers breed outside of the SPA network in the broader countryside. They also depend on High Nature Value Farmland for foraging and coastal and lowland winter roost sites. These habitats outside of Natura sites must also be considered as part of the assessment. Likewise for Dunlin and machair sites.
6. Article 4 of the Birds Directive afford special protection for migratory bird species. Article 4.4 states that member states must strive to avoid pollution of sites. This must be included in the AA. Again as per the Holohan ruling, the habitats outside of the designated sites which are important for these species must be included in the AA "if they are necessary to the conservation of the habitat types and species listed for the protected area".
7. In Autumn 2020 a new Birds of Conservation Concern will be published by BirdWatch Ireland and the RSPB Northern Ireland. There have been several publications by the NPWS in the last 18 months covering the status of Countryside Birds, Seabirds, Waterbirds, some breeding waders. Raw data from the NPWS on the Article 12 reporting to the European Commission should also support assessment. It is very important that the Birds Unit of the NPWS is consulted as part of this assessment.

[5] **Colhoun** K. & **Cummins**, S. 2013 Birds of Conservation Concern in Ireland 2014-19

C: BirdWatch Ireland collated stats on the status of biodiversity as it relates to agriculture in Ireland
Status of birds, other biodiversity and habitats in Ireland as it relates to BirdWatch Ireland focus areas.

- Two thirds of Ireland's regularly occurring wild bird species are Red or Amber-Listed Birds of Conservation Concern in Ireland. Farmland birds in particular are continuing to show declines and no recovery from the catastrophic and steady crash in populations since the 70s and up to this day. Habitat loss/change and change in farming practices are leading causes of losses[6] [7]. Corncrake, Barn Owl, Yellowhammer, Twite, Whinchat as well as the suite of breeding waders like Curlew, Lapwing, Dunlin, Golden Plover, Redshank and Snipe are severely threatened. Other more common farmland birds like Common Kestrel and Stock Dove are showing declines now, with Skylark and Meadow Pipit also ones to watch.
Information in the graphs below on catastrophic losses of farmland birds and including detail on breeding waders is taken from the 2007-2011 Bird Atlas[8]

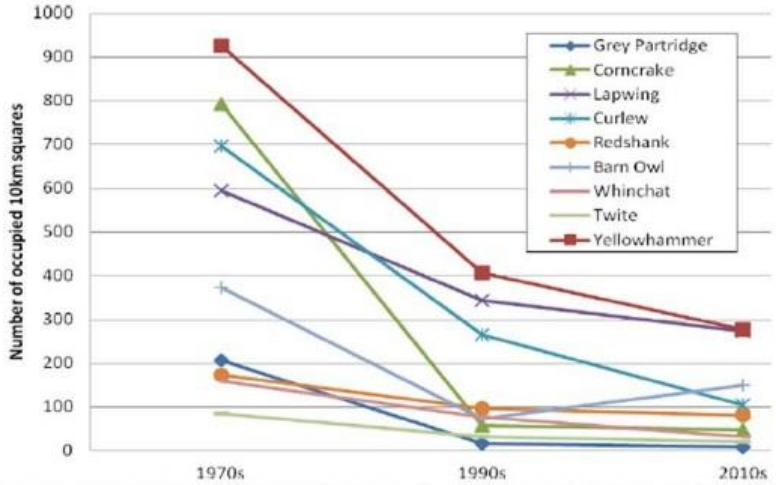

Figure 1: Range (number of occupied 10km squares) in 1970, 1990 and 2010 breeding bird atlases of Red-listed lowland farmland bird species in Ireland

Status and declines

		% Change	
Species	**Conservation status**	**1970-2010**	**1990-2010**
Curlew	IUCN /Irl Red	-78	-73
Dunlin	Annex 1, Irl Red	-69	-71
Golden Plover	Annex 1 Irl Red	-50	-42
Redshank	Irl Red, SPEC 2	-55	-47
Lapwing	Irl Red, SPEC 2	-53	-33
Snipe	Irl Amb, SPEC 3	-34	-8

[6] Colhoun K. & Cummins, S. 2013 Birds of Conservation Concern in Ireland 2014-19. Irish Birds 9:523-544
[7] Lewis, L. J., Coombes, D., Burke, B., O'Halloran, J., Walsh, A., Tierney, T. D. & Cummins, S. (2019) Countryside Bird Survey: Status and trends of common and widespread breeding birds 1998-2016. Irish Wildlife Manuals, No. 115. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht, Ireland.
[8] Balmer, D.E., Gillings, S., Caffrey, B.J., Swann, R.L., Downie, I.S. & Fuller, R.J. (2013) *Bird Atlas 2007-11: the breeding and wintering birds of Britain and Ireland*. BTO Books, Thetford.

- Birds on fragile mountain and hill habitats such as breeding Hen Harrier, Red Grouse, Golden Plover are in a precarious position.
- One third of our 99 wild bee species are threatened with extinction. Reasons for decline include; Loss of habitat through conversion of low-intensity farmland and semi-natural land to intensive farmland, forestry and urban/ industrial use; Loss of flowering plants as a food source due to changing farming practices are reasons for decline; Poisoning from pesticide use[9]
- 40% of our wintering waterbirds have declined in 20 years with changes in land use threatening geese, swans and some wader species[10]
- 85% of EU protected habitats (the best of the best and internationally important) have 'bad' conservation status according to the latest report from the Irish government to the Commission[11] and 70% of these are negatively impacted by agriculture[12]
- There has been a loss of 28% of the surveyed area of the EU protected and Annex 1 lowland hay meadow habitat since 2013 due to impacts of intensification of agriculture and application of slurry[13]**.**
- Water quality results show a decline in Ireland in the period 2013-2019 after a period of stabilisation with now only 53% of Ireland's surface water bodies having satisfactory **water quality.** The number of pristine water bodies has fallen to 20 from 500 since the 1980's. Pollution from agriculture is a dominant factor along with wastewater discharges[14].
- Eutrophication of freshwater bodies is considered to pose a high-level pressure and medium-level threat to four waterbird species namely, Goldeneye, Pochard, Scaup and Tufted Duck; and a medium-level pressure and threat to Coot and Gadwall[15].
- The NPWS Article 17 report to the European Commission on the status of protected species (2019) including water-dependent species states 'The Agriculture category represents the highest percentage of High-importance pressures (Figure 9) relative to other categories, with the incidence predicted to increase over the next 12 years; this has been linked to the threat from fertiliser and pollution on selected fish species[16].
- Greenhouse gas emissions nationally have increased and those from agriculture have not only increased, they are projected to increase further out to 2030 to 38% of total emissions[17] [18].
- Drained peatlands (raised bog, upland blanket bog and other peat soils) and related activities account for emissions of c.11 million tonnes of CO2 per year[19] - equating to total emissions from the energy sector in 2018 (11.7 million tonnes CO2 per year)[20]
- Forestry is a significant pressure and threat to Red and Amber listed birds of Conservation Concern[21].

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[9] FitzPatrick Ú., Murray T.E., Byrne A., Paxton R.J., Brown M.J.F. (2006) Regional Red List of Irish Bees, Publ. Rep. to National Parks and Wildlife Service (Ireland) and Environment and Heritage Service (N. Ireland).

[10] *Burke, B., Lewis, L. J., Fitzgerald, N., Frost, T., Austin, G. & Tierney, T. D. (2018) Estimates of waterbird numbers wintering in Ireland, 2011/12 – 2015/16. Irish Birds No. 41, 1-12.*

[11] NPWS (2019). The Status of EU Protected Habitats and Species in Ireland

[12] NPWS (2019). The Status of EU Protected Habitats and Species in Ireland, pg 84.

[13] Martin, O'Neill and Daly, 2018). Martin, J R, O'Neill, F H and Daly, O H (2018) The monitoring and assessment of three EU Habitats Directive Annex I grassland habitats. Irish Wildlife Manuals 102, National Parks and Wildlife Service, Ireland

[14] O'Boyle, S., Trodd, W., Bradley, C., Tierney, D., Wilkes, R., Ní Longphuirt, S., Smith, J., Stephens, A., Barry, J., Maher, P., McGinn, R., Mockler, E., Deakin, J., Craig, M., Gurrie, M., (2019) Water Quality in Ireland 2013–2018, EPA Wexford.

[15] Lewis, L. J., Burke, B., Fitzgerald, N., Tierney, T. D. & Kelly, S. (2019) Irish Wetland Bird Survey: Waterbird Status and Distribution 2009/10-2015/16. *Irish Wildlife Manuals*, No. 106. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht, Ireland.

[16] NPWS (2019). The Status of EU Protected Habitats and Species in Ireland, pg 90
https://www.npws.ie/publications/search?title=article+17&keyword=&author=&series=All&year=&x=31&y=8

[17] Ireland's Provisional Greenhouse Gas Emissions 1990-2018
https://www.epa.ie/pubs/reports/air/airemissions/ghgprovemissions2018/Report_GHG%201990-2018%20Provisional%20Inventory%20October%202019.pdf

[18] Ireland's Greenhouse Gas Emissions Projections 2018-2040
https://www.epa.ie/pubs/reports/air/airemissions/ghgprojections2018-2040/Greenhouse_Gas_Projections.pdf

[19] Wilson, D., C. Müller, and F. Renou-Wilson, Carbon emissions and removals from Irish peatlands: current trends and future mitigation measures. Irish Geography, 2013. 46(1-2): p. 1-23.

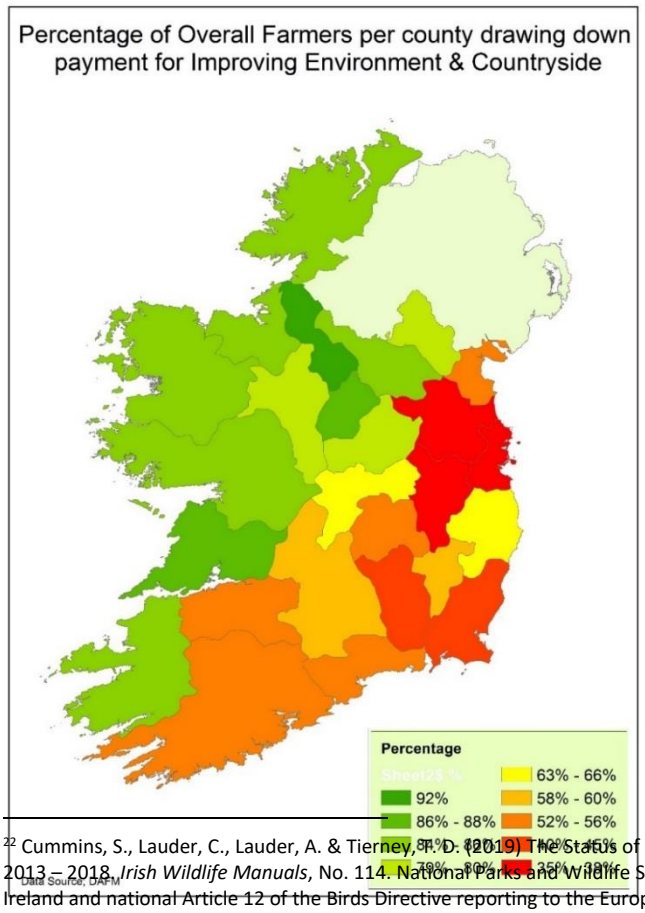
[20] Duffy, P., et al., National Inventory Report 2018. Greenhouse gas emissions 1990-2016 reported to the United Nations Framework Convention on Climate Change. 2018. p. 581.

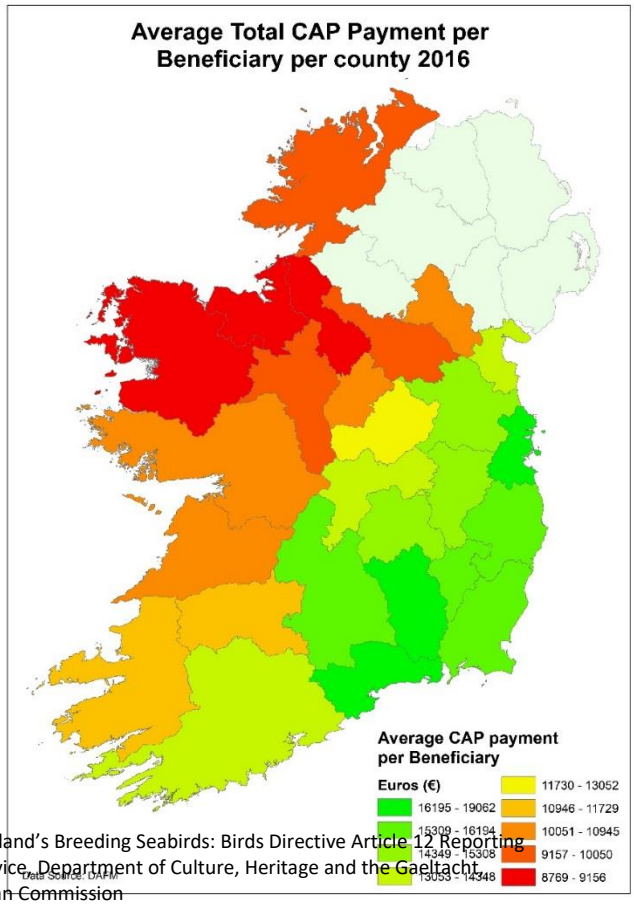
[21] Corkery et al 2019 Changes in forest cover result in a shift in bird community, composition *Journal of Zoology* doi:10.1111/jzo.12757

- In relation to Ireland's 24 breeding seabird species (threat level is medium or high)[22]:
    - 22 are threatened by wind, wave and tidal energies if not planned correctly
    - 21 are threatened by fisheries bycatch
    - 18 are threatened by climate change
    - 13 are threatened by marine plastics
    - 11 are threatened by recreational activities
- Six species of sharks, skates and rays in Irish waters are Critically Endangered, a further five species are Endangered, 6 species are Vulnerable and 19 are near threatened according to IUCN Red List criteria. In essence 62% of Ireland's rich cartilaginous fish species are in trouble[23] and the foremost risk in Irish waters is over-exploitation as part of commercial fisheries.
- 45% of fishing limits agreed for 2020 in the North East Atlantic are in excess of scientific advice and eight Irish stocks are critically overfished where scientists have advised that no fish should be taken.

D: CAP economics and environment in Ireland

Data published by the DAFM in the CAP beneficiaries database[24] was investigated by BirdWatch Ireland and reveals an allocation of just over €1.6 Billion to the Irish agri-food sector for all measures under CAP (Pillar 1 and Pillar 2) in 2016. Within this allocation, nearly €365 million (22.7% of the total CAP budget) was drawn upon from Pillar 2 for measures 'Improving Environment and Countryside'. However, the allocation of these funds across Ireland is very different (see Figure 4 and Figure 5) and is not going to those farmers who need it most to support biodiversity and water.





[22] Cummins, S., Lauder, C., Lauder, A. & Tierney, T. D. (2019) The Status of Ireland's Breeding Seabirds: Birds Directive Article 12 Reporting 2013 – 2018. *Irish Wildlife Manuals*, No. 114. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht, Ireland and national Article 12 of the Birds Directive reporting to the European Commission

[23] Clarke, M., Farrell, E.D., Roche, W., Murray, T.E., Foster, S. and Marnell, F. (2016) Ireland Red List No. 11: Cartilaginous fish [sharks, skates, rays and chimaeras]. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs. Dublin, Ireland.

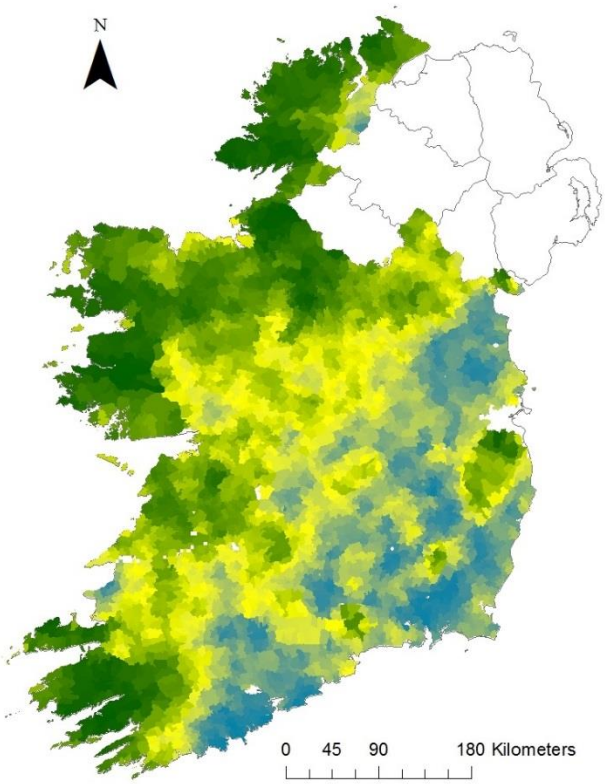
[24] Data derived from CAP beneficiaries database (https://www.agriculture.gov.ie/agri-foodindustry/euinternationalpolicy/commonagriculturalpolicycap/capbeneficiariesdatabase/); accessed Jan-18

Figure 4: Number of farmers (as percentage) drawing down payments from CAP in 2016 for Improving Environment and Countryside as a percentage of overall farmer numbers (farmer numbers derived from the CSO farm census 2010)

Figure 5: Displays the average total CAP payment received by individual beneficiaries in each county of Ireland for 2016.

Figure 4 shows the proportion of farmers drawing down Pillar 2 payments for measures associated with "Improving the Environment and Countryside" in 2016 on a county-by-county basis. The number of farmers in each county is based upon CSO statistics from 2010 (the most recent census data available). The Pillar 2 measures include agri-environment schemes and the Areas of Natural Constraint (ANC) schemes. By contrast, Figure 5 shows the average payment per county to CAP beneficiaries (under Pillar 1 and/or Pillar 2) in 2016. The differences between the two figures are striking, with a clear north-west: south-east divide. The scale of this divide is also substantial, with farmers in Cos Kilkenny and Waterford receiving almost twice the average CAP payment compared to farmers in Mayo, Sligo and Leitrim, yet perhaps only half the proportion of farmers in these areas undertake environmental management measures in comparison to the north-west.

What is even more stark, and when considering the value for money of overall CAP funding, is to compare these economic maps with indicators for the delivery of public goods. For example, Figure 6 shows the likelihood of HNV farming in Ireland. This map uses five variables (Corine landcover data split into three classes; farmed semi-natural land, semi-natural land and non-semi-natural land; average stocking density; hedgerow density; river and stream density and soils diversity) that are available at a national scale to map HNV farmland likelihood at an Electoral Division scale[25].



[25] This map was downloaded from the IDEAL-HNV project http://www.high-nature-value-farmland.ie/hnv-distribution/ (accessed March 2018); please see this website for further information on HNV farming, and the uses and limitations of this map.

Figure 6: Map showing likelihood of HNV farming in Ireland; green indicates high likelihood; yellow indicates intermediate likelihood and blue indicates low likelihood of having HNV farmland. (Map sourced from IDEAL-HNV (http://www.high-nature-value-farmland.ie/hnv-distribution/)).

It is clear that HNV farming occurs where average CAP payments are lowest (e.g. the north-west) and the proportion of farmers drawing down payments to improve the environment and countryside (such as agri-environment or ANC payments) is highest. To meet CAP and EU objectives, funding should be directed towards areas delivering non-market, public goods (such as a healthy environment). It is clear from Figures 5 and 6 that the current CAP model instead directs money to areas where environmental outputs are low.