



BirdWatchIreland
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protecting birds and biodiversity

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Mr Malcolm Noonan
Minister for Heritage and Electoral Reform
Via email : MOS@housing.gov.ie

16th May 2022

Please note two PDF attachments: one relates to the Commission observation letter and the other relates to concerns regarding the SEA and AA

Re: Ireland's CAP Strategic Plan 2023-2027 and the Observation Letter from the European Commission

Dear Minister Noonan,

I write to you in relation to Ireland's CAP Strategic Plan and the Observation letter from the European Commission, and to request a meeting with you to discuss our concerns. We set out in this letter, and in the attachments, key requirements that must be included in Ireland's CAP Plan. These are essential to increase environmental ambition, meet the objectives of the EU Green Deal and to set Ireland on a transition to much more sustainable farming, one that is more resilient to external shocks including climate breakdown.

The observations of the Commission are bleak in their description of the lack of environmental ambition in Ireland's CAP plan. This did not surprise as we have raised these concerns on numerous occasions including in the CAP Consultative Committee and in several submissions sent throughout the consultative process. There are welcome elements such as the Cooperation Projects, the inclusion of the breeding wader EIP and the application of GAEC 8 to all farmland. However, considering the reach of CAP and the significant €9.8bn in citizens' funding, overall the Irish plan does not incentivise farmers enough to undertake measures to address biodiversity loss on farmland and to support a change in direction. We estimate that only 5-7% (optimistic scenario) of the national budget will result in effective action for the environment which is well below the level needed to have meaningful impact. We hope that our concerns will be taken on board now that similar have been raised by the Commission.

Summary of Actions required to improve the draft CAP plan

In the attachments to this letter, there are specific key requirements which, if implemented effectively, would greatly improve Ireland's CAP plan and help meet the Commission's requirements. We provide a short summary here :

- Address Appropriate Assessment concerns
- Ensure Farm Sustainability plans are actual plans.
- The funding for the breeding wader EIP is not sufficient. It must be funded to €30million. (Commission letter point 35.6)
- Include and fund additional farmland bird measures supported by ecological advice in Pillar 2. (point 35.6)
- The weightings and conversation factors of non-productive areas in GAEC 8 inflate their biodiversity value. Revise these to reflect reality and not overstate the biodiversity benefits (point 3, 10, 20.5, 36, 103)
- Include all mapped semi-natural grassland sites and other mapped peat/flora protection order sites in GAEC 9 Environmentally Sensitive Permanent Grassland. (point 105)
- All hedgerows must be retained. The state must cease allowing farmers to remove hedgerows under GAEC 8. It has no legal basis (point 103)
- Differentiate and better fund Space for Nature and extensive grazing ecoschemes to reflect their biodiversity, climate, water quality benefits. (point 111, 113)



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Ireland's CAP Strategic Plan comes at a critical juncture for Irish farming. In the coming years the EU Nature Restoration Law will become clearer along with targets to restore critical habitats and species populations. We call on you to support our asks especially relating to the Breeding wader scheme and to set Ireland on the right path to support farmers into the future. I hope we can meet to discuss our concerns and help develop a more sustainable way forward

Yours sincerely,

Chris Corrigan
Acting CEO