



## CAP Strategic Plan Submission

August 2021

Irish Tillage has an output of €1.3 billion from just 7% of the land base with 11 thousand jobs linked to the sector. Our GHG emissions are extremely low and any increase in the tillage area will help meet the Ag sector's absolute emissions targets yet we find ourselves under the potential constraints of a new CAP Reform. The CAP deals to date have failed the Irish Tillage Farmer miserably and the proof of that is the severe loss of tillage land over those years.

The current proposals are going to do the opposite of what this CAP is aiming to achieve, such as Targeting the active farmer, aiding biodiversity and reducing climate change. It must be noted that we on the 'CAP consultative committee' have had no time as of yet to discuss potential Eco schemes even though they will make up 25% of payments.

- 1) Convergence. This will be the biggest threat to the future of the active tillage farmer. The vast majority of farmers are relying on their BPS for the bulk of their income. At present, most farmers would be better off leasing their land. This will happen further with convergence. More farmers will leave full time farming pushing more farmers into armchair farming or part-time farming whilst creating fewer, much larger farms. The tillage sector will be worst hit by this. Tillage farmers will be taking a further convergence hit under eco schemes as they will have contributed more and getting paid the same amount per hectare with more hoops to jump through. We insist on a maximum 85% convergence, but there also needs to be a way under Pillar 2 to target monies at the tillage sector to counteract the negative impact of convergence on tillage farms. A tillage specific scheme.
- 2) GAEC for Tillage Sector. This is a big worry for the sector as there is no value placed on work already done over the last 8 years. Tillage farmers had to do "eco schemes" as part of greening for the last 8 years yet now that will be under a GAEC conditionality and have to be done to even get a BISS. The Tillage sector is being further punished for making the improvements. It will push more land, particularly mixed farmers with a smaller area of tillage land into monocrop grass, adding to overall GHG emissions. There needs to be flexibility from DAFM particularly under GEAC 8 and 9. If the measures, like the 3 crop rule, can be left the same as currently under greening, it potentially could be manageable and we welcome the Dept of Ag seeking to achieve same with EU officials. We do propose that the areas under the 3 crop rule should be increased from 10, 20, 30 Ha's to 20, 30, 40 Ha's going forward. We believe it will encourage more mixed farmers back into tillage. It must be acknowledged that Ireland is very different than continental Europe regarding tillage land area base. We are 7% of the farmed area here in Ireland compared to countries in mainland Europe where the figure is far greater. We have limited markets for many crops and difficult

weather at harvest and planting times. A forced rotation would drive smaller and mixed farmers out of the sector. Will GEAC 9 be similar to EFA's?

- 3) [Eco Scheme](#). Tillage farmers have been doing it for the last 8 years via EFAs and Greening rules. There has been no recognition in current plans of the strides we have made as a sector. We face more hoops to jump through on top of what we as sector have been singled out to do in the current CAP plan. The eco scheme so far looks like it's been designed to get as many Grassland farmers through as possible without having to take many land use actions. It's going to be very difficult for tillage farmers. There needs to be more measures. It will be difficult to achieve 300 points while one whole section is specifically for animal welfare. On reducing chemical fertilizer, we have reduced use over the last 8 years and there is no account for the chemical fertilizer efficiency of tillage crops with our efficiency far exceeding other Ag sectors (This efficiency data is available from Teagasc). Tillage farmers should get a pass for eco schemes for what they are doing under GAEC or else a better list of options. If ECO schemes are going to be mandatory, it is important to get all farmers availing of them. If it is possible to link in some of the existing measures under greening and under proposed GAEC's this could be achievable. A few examples of measures include, leaving hedgerows to be cut every 2-3 years, green cover over winter pre-spring cropping. There are always areas around each farmyard that are often overlooked from an environmentally beneficial aspect. While eco schemes are going to cost farmers money, they should be designed in a way to benefit farmers in other ways.
- 4) [CRISS](#). This has the potential to take money from active tillage farmers and give to farmers that in many cases have their farms leased. Furthermore, this money will remain with the 'landowner' tax free. The active farmer gets financially punished. Any money being redistributed through CRISS has to be targeted at the active farmer.
- 5) There is no mention of domestic feed in the [suckler carbon efficiency program](#) and [dairy beef welfare scheme](#) have no requirements or promotion of domestic feed, despite its aim of reducing emissions. Some imported feed has up to 27 times the carbon footprint of domestic feed. This would be a low hanging fruit to achieve lower emissions from the beef and dairy sector. Any potential new drive with the likes of the current IGAS model needs the consumer fully aware of the use of native grains when they are choosing where and how they spend their money. We want the consumer to know how they can choose Indigenous Irish produce which includes native Irish Grain use. More work is also required by Teagasc on the inclusion of domestic feeds in livestock rations.
- 6) There needs to be a [Tillage specific program under Pillar 2](#). We believe Tillage will be financially more vulnerable than currently in the new CAP with the current proposed measures. There will have to be a scheme to reward tillage farmers for work done and being more environmentally friendly. The budget needs to set a target of €15,000 per tillage farmer to get achievable results. Our soil is our greatest asset and measures to promote its value and purpose is a must.

### Examples of measures,

- Beehives, (€100/hive). Similar measures for other pollinators.
- Small groves, awkward corners- 0.1Ha plant fruit and nut trees, Native trees. (€2500/Ha)
- Import slurry/FYM from livestock, pig and poultry sector. (value to be determined)
- Cover crops, more varied mixes, short term cover crops. (rates vary depending on seed mix)
- Summer cover crops. (€750/Ha) rather than planting or fallow, plant a summer cover crop to improve soil etc.
- Coated chemical fertiliser.
- Subsidised Lime.
- Bio-diversity strips in fields.
- 2/3/4/6 metre margins. (higher rates than GLAS)
- Low nitrogen use grain crops, potential examples including Malt barley and Oats.
- Measures to increase farmland birds: we have seen the population of species like the yellowhammer, barn owls and particular breeds of doves plummet in Ireland due to the loss of tillage land.
- Reed Beds and water FEATURES like ponds. Set Design, (€1000 per annum per FEATURE)
- Small re-wet areas, Nature corridors, trees along streams. (price to be determined)

These are just an example of measures that could be used under a Pillar 2 scheme. We would be happy to work with DAFM on other measures that would get results.

- 7) **Expanded coupled payments** The protein payment and SIM have been hugely successful thus far. They are also helping to achieve our climate targets. We welcome the retention and budget expansion of the protein payment scheme going forward but we believe more flexibility is needed for this to be truly successful. The inclusion of combi-crops and red clover (which is high in protein with no chemical nitrogen requirements) are two examples. The payment needs to be a minimum €350/Hectare going forward We want to see a long term commitment to SIM now that it has proved itself. We want some adjustments to the measure including the ceiling raised on the acreage an individual can apply for and the budget increased going forward.
- 8) We back the call for 60% grants proposed by "Women in Agriculture".
- 9) We question the need to increase compulsory margins along water courses from 2 to 3 meters. If this is necessary, we believe the margin should be available to be utilised in tillage schemes/programs going forward. The loss of production income was never compensated in previous CAPs.
- 10) Knowledge Transfer and Tillage Producer Groups are in essence an essential going forward for the sector. The social interaction is one key aspect but the mountain of information/policy coming from the EU needs a vehicle for farmers to grasp and learn through interaction with each other.
- 11) We recommend a return of a retirement scheme for generational renewal.
- 12) Long term leases should have entitlement claw backs on the lessor, perhaps 25-40%, depending on the length of the lease.

