



Response by ACA to

***Ireland's CAP Strategic Plan 2023-2027:
Public Consultation on Proposed Interventions***

Background and Methodology

Background

ACA welcome the opportunity to contribute to the recently published DAFM CAP policy paper entitled '*Ireland's CAP Strategic Plan 2023-2027: Public Consultation on Proposed Interventions*'. In the forthcoming weeks, ACA will seek to outline our views on all the critical CAP topics with the Department of Agriculture, Food and Marine through specific meetings to contribute and help in the direction of the next CAP for the benefit of the agri sector.

ACA, as the largest farm advisory body in Ireland and with a network of almost 170+ professional firms throughout Ireland employing in excess of 280 FAS approved advisors and 220 other technical and administration staff, have a long and established history of supporting Irish farmers since the late 1970's. Since our inception, our farmer client base has grown rapidly, based on Irish farmers seeking likeminded entrepreneurial, energetic and technical efficient individuals as farm consultants and advisors to assist them with their farming operations. Membership of ACA continues to grow with an expectation that member firms will exceed 200 in the next 12 months. Consequentially, a higher number of FAS registered advisors and farmer clients in Ireland will fall into the remit of ACA. The expectation is that the current client base of 55,000 farmers will exceed 60,000 by the end of 2023.

ACA welcome many of the proposed interventions to include the private advisory sector in a revamped AKIS in Ireland. However, ACA will seek to understand and clarify the actions that are expected to be implemented in the next CAP to ensure the overhaul of the AKIS is in line with EU policy and for the benefit of farmer clients of the private advisory service. We will also seek a commitment that equality of treatment and funding in many areas, currently absent when comparing public and private farm advisors in Ireland, are addressed comprehensively with actionable and quantifiable data in any new policy.

The benefits and opportunities of including ACA and its farmer clients in all proposed targets in a collaborative and meaningful manner in the next CAP are tremendous for the agri sector.

Methodology

In finalising our position on many of the CAP topics, ACA established a very successful CAP Focus Group campaign at the end of 2020 and into early 2021. Seven groups within the ACA membership were established which culminated in excess of 70 members participating, discussing the implications of current and new policies in CAP on the agri industry. These groups leveraged on the vast experience of ACA members in dealing with farmer clients and their families in Ireland, relationships in many cases exceeding 30 years.

Since January 2021, ACA have contributed and submitted a number of policy papers on specific aspects of the new CAP to the DAFM. Some of the ACA positions were presented through the CAP Consultative Committee or through related requests and consultative processes from the general public. Members were requested to contribute their views throughout the process and final positions were discussed by the ACA National Council.

Direct Payments Intervention

In this document, the proposed DAFM interventions under pillar I and pillar II will be discussed below. The ACA will contribute additional commentary and policy recommendations in the forthcoming weeks on all CAP issues as it is clear in the DAFM document that many areas are to be decided, as has the corresponding budget for these areas. ACA will engage with the DAFM following the 3rd of September and discuss and negotiate elements of the CAP where the ACA member is a critical component of individual policy areas and an important stakeholder to assist the DAFM with public policy for the betterment of Irish farmers and in meeting our EU and National responsibilities.

In advance of setting out our recommendations on the CAP areas throughout pillar I and II, we will detail our views on the specific questions relating to direct payments now as raised during this consultation process:

A. *Should Ireland implement capping at an effective rate of €66,000 or €100,000, or at a rate in between?*

ACA recommendations: On reviewing the *DAFM Modelling of future direct payments document*, a corresponding overview assessment of ACA farmer clients by members at our workshops, the capping of payments is not a major issue due to the small number of farmers in receipt of payments in excess of €60,000 in Ireland. The ambition of the EU is for a simplified payment system and any attempt to be fair and balanced in supporting all farmers is going to affect some in the extremes regardless of size, level of payments or farming activity. Therefore, ACA propose that capping in Ireland should be at the level of €100,000.

B. *Should internal convergence stop at 85% of the national average payment entitlement value in 2026, or should it go to a higher percentage?*

ACA recommendations: In relation to convergence, ACA state that similarly to any previous policy, there will be winners and losers, but in the majority the current system has found the correct balance to be fair to most farmers. The majority of farmers that were active in the original reference period (2000, 2001 and 2002), remain active today or have family members in place who continue the same level of farming activity. The sector should ensure that those that are in this position are encouraged and supported to remain farming and avoid any major

disenfranchising of this category of farmers. There are merits for both 85% and a higher convergence figure. ACA state that selecting a figure in between is of no major significance to the majority of farmers. Having reviewed the DAFM Modelling papers on Direct Payments, the evidence suggests that moving to a 100% figure by 2026 will not have any significant effects on the average payment nor on the number of receiving and contributing farmers. Shifting the policy to 100% by 2026 still permits a 5 year period for full convergence which is a fair time frame to allow farmers and the sector to prepare. Through any convergence policy, there is going to be a shift in payments from higher per hectare payments to lower entitlement values. However, if completed on a gradual trend as in the previous CAP (ending 2020) then a fair compromise will be achieved. As the convergence policy and a trend to a flat based system is indicated as the future of EU policy and is believed by ACA to be the fairest solution to the majority of farmers, ACA propose 100% convergence by 2026.

C. *Should Ireland go beyond the 10% of direct payments to redistribute from larger to smaller or medium-sized holdings? Or should Ireland seek to use the derogation to reduce the percentage? Should this funding be redistributed to farmers with holdings of less than 30 hectares?*

ACA recommendations: ACA conducted their own analysis on the *DAFM modelling direct payments results* and estimate that on average circa €600 will be received or contributed by farmers under such conditions over an entire CAP period. Convergence has worked relatively well in favour of those with lower payments since BPS commenced and any front loading proposal is now considered late and would have been more beneficial to farmers in the past. However, ACA understand that those with higher payments needed to be treated fairly at that time and that such a proposal would not have been welcomed by such farmers.

ACA state that further convergence will assist those under the National average entitlement value notwithstanding what is now proposed through these new interventions and believe the proposed redistribution is too burdensome in administration for the amount of potential financial return to individual farmers.

D. *Should Ireland go beyond the 25% of direct payments to be allocated to eco-schemes? Or should Ireland use the flexibility in the regulation to reduce the percentage allocated to eco-schemes?*

ACA recommendations: No. ACA believe significant time has been exhausted in deciding whether this figure should be 20%, 30% or a figure in between. As 25% is not the recommended figure, it is time to agree this proposed figure and move on to the important discussion in developing the actual final options to be available for farmers in meeting their eco scheme commitments across all sectors. Any eco figure must be receivable in full by all applicants by participation in the eco scheme by designing them in a simplified but effective and achievable way.

E. *What aspects of the current system do you consider unfair, and what is the best combination of all of the above mechanisms in order to bring about a fairer distribution of direct payments?*

ACA recommendations: There are challenges to ensure that commercial farmers, whether part-time to full-time, are treated fairly in the distribution of direct payments. ACA support further exploration of the concept the 'active farmer' but it is a difficult task to find a balance that will satisfy those in such situations against many other farmers' views, views which firmly believe a farmer is only a person with minimum stocking rates on their farms. The balance in the Area of Natural Constraint for example has now been achieved satisfactorily in our view. Furthermore, to meet our climate action targets across all agricultural and environmental policies, all lands have a purpose and farmers contributing environmental actions without livestock may be as important in helping the entire sector and their farmer peers in meeting such demands. More concerning is the level of unfairness in the long term leasing of entitlements. In many cases such farmers are in long term relationships with neighbouring farmers and have been over at least two CAP periods. ACA state that in the CAP 2023-2027, any proposed clawback should be removed from the sale of entitlements, with the exception of those allocated through the National Reserve as is similarly in place in the current CAP transition. It should instead be imposed on long term leasing of entitlements to try and rectify the imbalance of recipients continuing to rent/lease their land and entitlements or use the current allowance under BPS to claim their entitlement payment and sublet their lands to another farmer during the specified period as in the BPS Terms and Conditions.

F. Should there be a specific intervention to incentivise gender equality?

ACA recommendations: ACA state that there are no barriers to women becoming farmers presently. Instead, a vibrant CAP that encourages new entrants to the potential of real viable farmers rather than a new payment scheme will attract new entrants of every gender into the sector. Indeed, any gender equality incentives could form the basis of reverse discrimination on encouraging young men into the industry.

The interventions for pillar I and pillar II recommendations in the CAP 2023 – 2027 will be discussed below.

Proposed Pillar I Interventions

(a) Basic Income Support for Sustainability (BISS)

ACA support the current proposed interventions under BISS and we will monitor any further developments on this matter and contribute shortly as required.

(b) Complementary Income Support for Young Farmers (CIS-YF)

The agricultural industry needs a vibrant and committed workforce to achieve its targets. The scenario of abandoned land and rural areas is not desirable nor an ambition of EU and National policy. Irish agri policies in recent years have contributed greatly to encourage younger farmers into the sector through incentives such as the National Reserve and Young Farmer Scheme. The revised DAFM policy in 2015 to permit persons onto a herd number without a legal interest in the land was a significant shift and successful in addressing some of the challenges. However, anecdotal evidence would suggest that many of these arrangements have yet to fulfil a complete transfer of the holding but there is optimism that these arrangements will lead to a fulfilled succession transfer relatively soon. More needs to be completed as the majority of farms availing of these new policies are those with family members interested and willing to be involved in the farm and being a potential successor. There are tens of thousands of farmers who are not engaging in such new incentives.

ACA support the many incentives introduced in the current CAP for young farmers, which have contributed positively to encouraging younger people into the management of farms. Such supports as proposed under the CIS-YF must continue in CAP 2023 – 2027. Additional incentives and strengthening of existing supports in the form of extending lease exemptions, partnerships and shared farming arrangements must be considered for the more vulnerable sectors such as beef and sheep.

(c) Eco Schemes

ACA note that the core principle of a proposed eco scheme is to provide additional income support to farmers for undertaking actions beneficial to the climate and the wider environment. ACA support the proposed implementation of eco schemes through relevant ‘agricultural practices’ and will provide the opportunity for as many farmers as possible to

take up the most appropriate actions or intensity of actions on their farm. ACA do have some concern that some farmers may 'leave behind' the eco scheme payment due to a perceived onerous task of implementing such actions on their farms but the role of the ACA member and other advisors will be critical in assisting farmers with their selections but also in encouraging the uptake of the eco scheme measures.

ACA state that any eco scheme must be:

- Available to all farmers with flexibility to select options annually at application time
- Does not conflict with Pillar II schemes and incentives
- Can be applied for, implemented (on farms) and paid in the calendar year
- Low administration burden
- Straightforward to inspect by the DAFM
- Potential to align the eco scheme with any Pillar II schemes so that the undertakings can be used to progress to the Pillar II scheme (such as soil sampling leading to an NMP)
- Application process through the current online system with a facility of a drop down menu of options to be available, that would feed into a points/marking system matrix to assist the farm consultant/advisor in their discussion with farmer clients

ACA further acknowledge the request by the DAFM in the proposed intervention document for suggestions on appropriate measures at farm level to be included in the eco scheme. The following are a broad range of measures that should be available to Irish farmers to meet their commitment under the eco scheme:

- Calculate the length of hedgerows/drains/other landscape features using the LPIS system and establish a minimum baseline per hectare, similarly to the current EFAs measure of greening for tillage farmers since 2015. Estimations can be verified remotely by the DAFM and the majority of farms would "automatically" qualify except perhaps tillage or dairy farms. In such cases, the option to replant would be an eco-scheme measure.
- Soil Sampling – taken in year 1 (2023) and remain valid for four years. Sample results would be used to support any additional measures under pillar II.

- Implement a NMP on the farm, to be updated annually and keep associated records
- Bord Bia Quality Assurance or completion of the Carbon Navigator or equivalent – once these options are not a requirement of some other commitment by the farmer.
- Attendance at Agri related training courses – similar to continuous professional development. Proof of attendance to be submitted.
- Encourage the use of Protected Urea and reduced C.A.N. application, verified with fertiliser invoices for previous years.
- Low Emission Slurry Spreading for < 170 kg N/ha farms.
- Importation of Organic N and straw incorporation/min till on tillage farms.
- Water protection e.g. fencing option and exclusion of livestock from watercourses.
- Existing old woodland protection e.g. fencing and/or regeneration, individual tree planting/shelter belts/micro habitats in field corners
- Assess the farm for forestry and woodland creation potential.
- Assess forestry and woodland on the farm for achievement of forest management certification to FSC and PEFC standard.
- Determine the area of Ash plantation infected by Ash dieback on the farm which requires regeneration and replant the equivalent number with an alternative native species for landscape and biodiversity benefit.

ACA will set out additional measures for the eco scheme to the DAFM in forthcoming weeks during discussions on the CAP interventions.

(d) Complementary Redistributive Income Support for Sustainability (CRISS)

ACA views on CRISS have been outlined above in our answer to question (c) and we believe the advantages of implementing the proposed intervention in Ireland i.e. in monetary terms to the benefiting individual farmers will not be excessive and normal convergence methods will go some way to address any current imbalances.

Proposed Pillar II Interventions

(a) Agri Environment Climate Measure (AECM)

At the outset ACA welcome the commitment by the DAFM for the pilot Farm Environmental Survey (FES) and support a continuation of the programme in 2021 and towards an ambition of surveying all Irish farms. There has always been anecdotal evidence to suggest that previous environmental schemes in Ireland such as the entire Rural Environment Protection Schemes (REPS), Agricultural Environmental Options Scheme (AEOS) and the Green Low Carbon Agri Environment Scheme (GLAS) have been beneficial to the environment and countryside. Both farmers and farm consultants/advisors believe that both schemes did have positive effects but regrettably there was no significant measuring or recording completed, either in advance or during these successful programmes.

Therefore, it is critical for the future of the entire agricultural sector and to mitigate any proposed reductions or otherwise that these baseline environmental measurements of every Irish farm is conducted immediately in advance of proposed new AECM's. ACA are confident that there are significant environmental assets in Ireland, once measured, to greatly assist in our commitments to both our National and EU responsibilities under climate change without any major adjustments.

Scheme Design and Administration

Participation in previous schemes has always exceeded the programme target. Uptake of these environmental schemes are concentrated on livestock farms in the North, West and Midland regions. Previous surveys have also revealed that participating farms also tend to be small to medium or part-time holdings, while these schemes are least attractive to larger type farm operations such as dairy and tillage holdings. This constrains voluntary uptake in more intensive farms mainly in the south and east where environmental pressures from farming are greatest, thus limited the impact of these schemes on improving water quality and reducing GHG emissions. ACA welcome the proposal to have at a minimum the opportunity for all farmers to participate and complete base line actions. Thereafter, the additional payments can be through results based incentives, where the farm consultant/advisor will assist the farmer with professional advice to ensure their actions are delivered on their farm.

In order to conduct this AECM programme successfully, private advisors need to be provided with realistic time frames to engage with their farmer clients. ACA members working in the private sector operate their businesses on tight margins. The emphasis on CAP farmer schemes, corresponding deadlines and increased bureaucracy has reduced the amount of time private farm advisors can spend with their farmer clients to discuss other farm and personal related issues. This is the one major difference between public and private advisors.

ACA will be evaluating the Results Based Environment Agri Pilot Programme (REAP) separately to this paper but feedback to date from members overwhelmingly states that the current advisor time commitment would not permit up to 50,000 farmers into a new scheme, as indicated in the DAFM intervention document section 5.2 (1). However, a balance between past agri environmental schemes and a results base programme can be found through discussion and collaboration. ACA also state that they welcome the DAFM commitment to providing support to farmers for engaging professional services in the submission of REAP applications. This foundation must be advanced in the next CAP.

Recommendations for future AECM

Following the ACA CAP workshops, the following recommendations were provided by the working group for a new agri environmental scheme:

- The current payment limit of €5,000 in GLAS and similarly in REAP, (while it allows schemes to be applied across a large number of farms), needs to be increased to incentivise public good benefits for intensive farmers as well as extensive holdings.
- Consideration of refining and developing the GLAS programme to expand uptake of options and introduce results based actions within the scheme.
- Within the first two year period of the plan, amendments of plans should be allowed, especially where obvious innocent errors have occurred and for science based reasons.
- Continuation of the mandatory requirement for preparation and submission of applications by advisors but also with an important role in the provision of training to farmers to assist them with their knowledge and understanding of their on farm obligations.

- Annual assessment to be completed by the farm consultant/advisor (similar to the annual requirement now in REAP or the 1C form in the past REPS programmes) to monitor the farm plan progress and support the farmer with knowledge and other tools to successfully implement the prescribed works.
- A professional forester involvement should be mandatory in any new actions surrounding Forestry, Woodland and Tree planting on an annual ongoing basis. Devise incentives/actions to incorporate tree planting on farms.
- Use of Digital tools where necessary in the scheme, must be freely available to advisors at provided at no cost, as in the public advisory service.
- Explore opportunities to incentivise uptake amongst intensive farmers.
- There should be a long lead in time for the submission of applications. Previous experience of the very short application time for GLAS 1 and 2 will not be conducive to visiting high numbers of farms and providing adequate time to discuss all options with farmer participants and submit corresponding applications.
- Annual farmer training for AECM participants.
- Consider a Commonage only scheme for eligible applicants in those areas.
- Introduce a plan duration of up to 7 years, which will allow proper monitoring and development of outcomes including management practices, for example, allowing botanical diversity to fully develop.

ACA will contribute again to this discussion in forthcoming weeks and we will be providing our own internal review report to the DAFM on REAP, which will give a valued and accurate assessment of the strengths and challenges of a wider results based programme in Ireland.

Inclusion of forestry and trees in an AECM

Forestry and woodlands both existing and new must form a central component of the new AECM's. The benefits include climate change mitigation, biodiversity, flood relief, water quality and society benefits. All forestry and woodlands, both existing and new, should be assessed and treated equally, recognising the need for both commercial and environmental forestry and woodlands. There must be no penalty or recoupment of monies received by the

applicant should the applicant wish to convert a greater portion of their holding to forestry, woodland and tree planting during the duration of any scheme.

The input of an approved forester must be a core requirement of any proposed AECM's if the following actions are taken on by the farmer applicant and such applicants must have priority entry to the scheme, where a selection process is implemented:

- Planting a grove of native trees (suitable sites).
- Organic farming/forestry and woodland creation.
- Shelter Belts and native conifer woodland creation.
- New afforestation projects.
- Individual specimen tree planting.
- Regeneration of existing woodland.
- Tree planting around farmyards and buildings.
- Riparian planting and fencing along watercourses in addition to flood prevention woodlands.
- Native woodland creation.
- Agro-Forestry
- "Hotspot" planting adjacent to watercourses to mitigate nutrient run off.
- Implement eradication/control measures on invasive plant species.
- Tree health improvement (Ivy), and hedgerow landscaping to counteract the Ash dieback disease.
- Traditional Orchards

ACA note in the intervention proposal under AECM, that farmers will be required to address priority assets on their farms, similar to previous agri environment and climate measures. ACA will meet the DAFM shortly to discuss the proposed actions and outline our views and recommendations but in summary we are outlining the following measures as some of the desirable actions on farms in relation to biodiversity, water quality, soil and climate challenges:

- Coppicing hedgerows and aftercare management.

- Laying hedgerows and aftercare management.
- Planting new hedgerows and aftercare management.
- Rotational hedgerow management on a 5-7 year programme.
- Protection of archaeological sites, especially overgrown sites.
- Protection of all watercourses on OSI maps.
- Traditional stone wall maintenance.
- Low-Emission Slurry Spreading.
- Pollinator plans.
- Low Input Permanent Pasture/Low Input Grassland (action orientated).
- Low Input Permanent Pasture/ Low Input Grassland (Result option).
- Traditional Hay Meadow (Action orientated).
- Traditional Hay Meadow (Result option).
- Multi Species Ley as in REAP.
- Sowing wild flower strips or meadows (min tillage).
- Management of heath and bog habitats.
- Alternative watering for field grazed livestock.
- Solar/Wind energy abstraction.
- Establishing multi-award biodiverse grazing swards.
- Carbon Navigator, where it is not mandatory for another farm scheme payment.
- Creation of pollinator margins/biodiversity strips along field boundaries
- Secure Forest Management Certification on existing forests and woodlands to FSC and PEFC standard.
- Liming based on up to date NMP.
- Non SAC Heather areas.
- Public walks/greenways (Public Goods).
- Health and Safety actions and keeping yards, buildings and the local environment tidy.
- Establishment of dry ditches.

(b) Agri Environment Climate Training

In many of our recent submissions and policy papers, ACA have at all times stated that farmer training must be a priority before and during the next CAP. Previous training programmes for farmers were very successful but were provided too late into programmes to enable the farmer to implement their required actions accurately on their holdings. ACA believe that generation renewal may affect the uptake of environmentally friendly practices and other objectives in CAP. Annual mandatory training of farmers as in the proposed interventions and to be provided through a FAS approved advisor are welcomed by ACA and in line with our proposals to date. However, ACA state that all farmers must be included in at least one days mandatory training on the subjects proposed. By providing training to participants in AECM only, it excludes over 50% of Irish farmers, many who are recognised as being in a higher vulnerable risk category, either through age, income challenges or on farms with higher environmental risks. Training, targeted at sectors where CAP payments are the main source of income, would improve retention of direct payments on farms where these payments are currently more than 100% of farm income. Training with a focus on sustainable farming would contribute to increased farmer income and reduce pressure to increase the overall CAP budget if retention of CAP payments at farm level was improved.

The ACA, DAFM, Teagasc and other agencies must have an input into the design of training programmes for farmers but ACA would be best placed to deliver the various programmes required to meet the objectives of the CAP to farmers. ACA also have a better reach (160+ ACA member offices throughout Ireland compared to 49 with Teagasc) to farmers in the vulnerable sectoral categories who are not benefiting from current training models. The cost of the input of ACA members in the provision of this training to farmers will be €x and will be discussed with the DAFM shortly before inclusion in the CAP Strategic Plan (CSP).

(c) Organic Farming

A number of ACA members specialise in the provision of organic services and advice to Irish farmers throughout the country. ACA support the proposed interventions and separately we are completing a detailed '**Organic Review and Outlook**' presently, which will be submitted shortly to the DAFM. This paper will evaluate the organic programmes in the past and draw

on the experiences of our members and their organic farmer clients and outline incentives and proposals for the CAP 2023 – 2027.

The following are the main points/recommendation from our organic farming workshops:

- There is a big opportunity for tillage farmers to enter a lucrative organic sector, with oats being the main crop produced.
- The market is misaligned, with the majority of organic farmers being beef and sheep farmers, while the main markets are in the organic tillage and horticulture sectors.
- There is a small and growing market for dairy produce. Beef is well suited to organic as it is a grass based system but the demand is poor. There is a lot of leakage of organic beef to the conventional sector and the sheep market is very small but seasonality does affect this sector.
- DAFM targets were described as ambitious which included doubling cereal acreage, increasing dairy production and doubling beef numbers.

The following limitations were identified in our discussions:

- Poor organic knowledge among advisors, which leads to poor promotion in organics to farmer clients as a viable enterprise. This affects both public and private advisors.
- Poor farmer knowledge which also curtails uptake of the OFS.
- Lack of connection between sellers and buyers in the market e.g. selling weanlings as commercial cattle in the local Mart instead of through identified organic outlets.
- There are conflicts with GLAS for example with no payment on LIPP, THM, WBC – such challenges must be avoided in new AECM's.
- Most training and demo farm walks funds are provided to Teagasc. There are many specialists within ACA and these opportunities must be resourced and supported by the DAFM to capture farmer clients of private consultants/advisors and the wider farming community.
- There are no refresher courses after the initial 25 hour course.
- There is no organic association in Ireland to assist in the promotion, governance and support and there seems to be a lack of appetite to promote organic farming among the existing associations including Bord Bia

ACA Proposals for the Organic Sector:

- In house ‘train the trainer’ course for ACA members that want to be part of the promotion of organics. ACA will set out in the aforementioned report the resources required to support this initiative.
- Qualified ACA members to be certified to run 25 hour training courses and any proposed refresher courses must also be run by qualified ACA members.
- Fund farmer information courses on the sector.
- Payment for wild pollinator strips, increase inorganic payment for horticulture and cereal growers, incentives for cereal growers to have a vegetable as a break crop and a derogation for any future ploughing disincentives i.e. payment for min till and no till systems.
- Link organic growers with farmers exporting farmyard manure/slurry with additional incentives to export to an organic grower on low soil indices.
- Government canteens should promote organic produce and help incentivise and increase the market demand for organic produce.

(e) Areas facing Natural Constraints (ANC)

(f) Producer Organisations in the beef and sheep sector

(g) Suckler Carbon Efficiency Programme

(h) Dairy Beef Welfare Scheme

(i) Sheep Improvement Scheme (SIS)

ACA support the continuation of the ANC for farmers in areas of natural and specific constraints. By providing training and other resources, there are many opportunities for ACA members as advisors in the establishment and advisory supporting roles for Producer Organisations. ACA will discuss these opportunities directly with the DAFM shortly. Tremendous advancements have occurred for breeding as a consequence of the BDGP. Greater efficiency and sustainability opportunities can occur in the suckler and beef sector and for farmers outside any proposed KT programme, ACA support the proposed training for farmers in the suckler carbon efficiency programme to continue the progress made to date in this sector.

Furthermore, training under the Dairy Beef Welfare Scheme is critical and ACA support the training intervention measures. Again, as outlined heretofore, ACA are best placed to train farmers under all such programmes and the cost of the input of ACA members in the provision of this training will be €x and will be discussed with the DAFM shortly.

The measures outlined under the Sheep Improvement Scheme are positive and all stakeholders should note the success of the BDGP and work together to gain similar benefits for the sheep sector. ACA members have more interaction with farmers in BDGP, due to the extensive information and data available through ICBF and other sources, which was a regular topic at KT meetings. More work needs to be completed to provide sheep data and information to online platforms, which will ultimately engage the farm consultant/advisor to greater levels than we have today.

ACA support the current proposed interventions under these measures above and we will continue to monitor any further developments on this matter and contribute as required.

(j) European Innovation Partnership (EIP-Agri) Operational Groups

ACA members throughout Ireland are key players in many current EIP's and their involvement has been very important for the success of these programmes. ACA as a representative body has not been involved in the past in a specific EIP but it is an ambition of the Association to be involved in the EIP programmes in the next CAP and draw on individual member experiences and expertise to set up and implement innovative projects across the country for farmers and rural areas. ACA will explore such opportunities with the DAFM and promote the programme within our membership and farmer client base.

(k) On Farm Capital Investment Scheme

Overall TAMS has been a very successful scheme for Ireland, supporting all farmers with on farm investments and assisting through grant aid the introduction of IT and other farm technology advancements. ACA have recommendations (which will be set out directly shortly) for the roll out and administration of such a programme but we strongly support its inclusion in CAP 2023 – 2027. The programme must be available throughout the entire next CAP, not only for structural developments on farms, but to support farmers to implement new actions on their farms under obligations for climate action, water quality and farm safety.

(l) Continuous Professional Development (CPD) for advisors

ACA state that the most critical challenge for our sector is to provide an immediate training programme to the private advisory service to ensure all farm advisors/consultants are prepared for the new objectives of the sector. ACA members provide support services to their farmer clients on a commercial basis. We receive no state support for the provision of such services or for the training of our members. ACA members and professional staff, as private advisors, must receive the same training supports and service provisions as the public advisory service to ensure equality for all advisors and to also meet the new challenges within the sector and ensure the objectives of CAP 2023 – 2027 are clearly disseminated to farmer clients.

ACA welcomed the announcement in 2020 by the DAFM Minister McConalogue for funding of €1m in the provision of a CPD programme for advisors. We understand that there are many other challenges within our state presently in the past 12 months but training in the public advisory service has continued with DAFM support during this period and ACA seek the commencement of our training immediately.

ACA support the proposed interventions for advisor CPD in the next CAP. However, ACA wish to be part of the discussion on the areas and modules to be developed and the proposed reform of the Farm Advisory Service (FAS). We will engage with the DAFM on these topics shortly.

(m) Knowledge Transfer Programme

According to DAFM figures, ACA members acted as facilitators to over 50% of the Knowledge Transfer programme in CAP 2015 – 2020. The agility and technical expertise of the private advisory service proved instrumental in the success of the KT programme. During our CAP Focus Group sessions, considerable discussion took place on the merits and challenges of the previous KT programme and significant proposals were proposed by members for consideration and inclusion in a new KT for CAP 2023 – 2027.

During our CAP Focus group sessions and discussions at workshops and associated meetings, the following is a general overview of our recommendations for a new KT in CAP 2023 – 2027:

- Restrictions of 5 groups per facilitator should be removed. Up to 10 groups per KT facilitator should be permitted as the facilitator see fits to manage themselves.
- Allow up to 20 members per group with replacement of farmers within groups permissible once they meet minimum attendance requirements.
- No requirement for new participants in each group as it will undermine group cohesion from previous schemes.
- Flexibility on the holding of meetings on Saturdays and Bank holidays should be explored to encourage more part time farmers to participate in the scheme. This will enable meetings on farm during daylight hours in the winter months. Meeting start times to be extended to 9pm if required.
- Feedback from animal health plans has been poor across all sectors and this requirement should be removed from future schemes as it is a significant cost burden to participants with limited benefit.
- A 5 year KT programme to be introduced to ensure continuity in groups rather than a stop start system which has happened due to transition from previous schemes such as BTAP/STAP to KT and KT to the future scheme.
- Distribution of payments from facilitators to continue as this has worked efficiently. Payment confirmation should be reduced to one page signed document.
- Publishing of farmer payments to facilitators on CAP database to be removed as it does not represent distribution of funds accurately.
- Payment distribution to advisors must be within the calendar year.
- Payment increase to €x for facilitators and €x for participants (ACA will discuss this directly with the DAFM KT Unit shortly for inclusion in the CSP).
- Access must be provided to ACA members to Teagasc databases of state funded material for KT meeting preparation – links in with commentary on AKIS below. A centralised database system in ACA Head Office to be DAFM supported and resourced to prepare and disseminate material for KT meetings to ACA members.
- Dual meetings between two groups to be allowed to avail of additional expertise.
- There should be no restrictions on the number of meetings per day as this proved challenging in getting expert speakers who had to travel a considerable distance to return to numerous groups on different days due to the KT scheme requirements.

- In-service training for advisors to be provided on all KT topics and linked in with the DAFM proposed interventions for CDP training of advisors. ACA to discuss our training needs in KT with the DAFM to ensure adequate budget is included in the next CAP.
- There must be a reduction in the volume of KT paperwork with an increased emphasis on farmer meetings. ACA support up to 8 meetings per year for each group. This must include at least one farm visit by the advisor annually in conjunction with a tailored farm recommendation plan rather than following previous generic farm improvement plans.
- Allowances for administration and associated expenses such as travel and subsistence must be given to the private advisory sector in the next KT programme. It is not equitable to remunerate public and private advisors the same facilitator payment when all expenses related to the public advisory KT groups are paid additionally through DAFM state funding.

ACA will present our recommendations shortly to the DAFM and discuss methods of improving the KT system and ensuring a successful programme in the next CAP. ACA will also set out the budgetary requirements of €x towards the facilitator payment and the additional administration and related expenses burden.

Additional Commentary on other CAP areas

1. AKIS – current state of play in Ireland

DAFM figures indicate there are 137,000 farmers in Ireland. Teagasc in their own report in 2017, state they advise close to 44,000 farmers and as ACA member firms advise 55,000 farmers, there remains a balance of approximately 40,000 farmers in Ireland that have no direct contact with either an independent/private or publically funded farm advisor. Although, Irish farmers interact with their feed and agri merchants, co-ops and other agencies, 73% of farmers retain either a private or public farm consultant/advisor annually to provide advisory services. The Farm Advisory Service is an EU requirement, enshrined in legislation and the majority of active farm advisors on this list are members of ACA or employees of Teagasc. Therefore, there are so many ‘easy wins’ by first ensuring greater collaboration between both bodies.

The 2014 AKIS and advisory services in the Republic of Ireland Report for the AKIS inventory (WP3) of the PRO AKIS project (Prager and Thompson) did not reflect fairly or accurately on the presence and work of private farm consultants/advisors in Ireland. Statements such as *‘although private consultants have grown in numbers, they remain dependent on public funding (via environmental or other schemes)’* were factually incorrect. Private consultants source their income directly from their farmer clients and at no cost to the state. Another statement on page 17 of the same report outlines *‘in terms of educating young farmers and supporting them in the period after takeover of the farm, Teagasc and Teagasc advisors are crucial. In theory, this teaching role could also be delivered privately, however, the private advisor in small units do not have the tradition of providing education’*. Again, this is inaccurate and ACA believe a deliberate attempt to ‘pigeonhole’ the role of the private advisor with a limited set of skills. Many ACA members are recognised widely throughout Ireland as the leaders for farm succession discussions, transferring of the family farm and all the associated communications and work for such projects.

ACA members have been training farmers since 1994, when the Rural Environment Protection Scheme (REPS) was introduced, and since then have been the leaders in training in the Suckler

Welfare Scheme, follow up REPS programmes, GLAS courses, the DAFM Knowledge Transfer programme, Health and Safety courses, organic farming and many other areas.

The same report referred to above did state on page 22 that *'it seems appropriate to invest efforts to explore the challenge how Teagasc and the private consultants can co-operate and work together so that the AKIS works better, and what criteria and indicators would describe 'better'*. Regrettably, there has been little progress and ACA sought a Memorandum of Understanding as a starting position to modernise the dissemination of information to Irish farmers - we are hopeful that progress can be made on this issue very soon. Regardless, the DAFM must step in as an intermediary to make this work.

Teagasc clients have access to a substantial amount of publically funded material and events using a multi-million euro annual budget on marketing and advertising but there are 90,000 other Irish farmers who do not engage or do not wish to engage directly with Teagasc. These cohort of farmers do not receive such information directly. For the betterment of the entire agri sector, this must change.

As a semi state body, Teagasc have a responsibility to all Irish farmers and they must lead in finding ways to get public funded research and information to ACA members and other stakeholders, thus securing knowledge and information exchange with circa 100,000 Irish farmers. In the absence of such agreements or reform under any proposed AKIS measures, the objectives of a new CAP policy are seriously threatened and undermined.

AKIS – basic recommendations for positive steps forward

1. Currently the AKIS system has no formal structure and is very adhoc. The link from the high end research across all government agencies/bodies is missing with private farm advisors. ACA as the presentative body of over 75% of private farm consultants/advisors in Ireland must have a direct role and representation on decision making committees/groups.
2. There is a consensus among ACA and our membership that as advisors we need to return to visiting farmers and discussing issues with them on their farms. However,

time is the limitation for the private sector and supports must be provided to enable advisory sessions with farmer clients as demanded.

3. All state funded tools and IT platforms used by the public advisory system must be provided to ACA members (and indirectly their farmer clients) without cost. The state must intervene, where required, to invest and supply these platforms for the benefit of farmer clients of private advisors.
4. Advisors can be overwhelmed with all the daily information, new regulations and changes – there is a role for the ACA office to be funded and resourced by the DAFM to assist members with this issue, by having a library/reference area and online platforms to condense all information into user friendly and practical materials, as is completed and funded by the state in Teagasc. This resourced centre will also link in with Teagasc centres and all other government agencies and bodies to be the conduit to ACA members and in excess of 55,000 Irish farmers.
5. The most efficient way to increase income on many farms will be through uptake of available technologies, particularly in sectors (beef farming) where profitability is low and the uptake of available technologies is generally poor. There is clear role for ACA in a reconfigured AKIS to assist with greater efficiency and sustainability and a win-win if farm income is improved without increasing stock numbers.
6. Part of the farm income problem relates to an AKIS that is no longer fit for purpose. It was configured historically to increase production and production efficiency and it needs to be radically realigned to deliver a much broader agenda and include ACA at its core objectives.
7. State Aid funding solely to Teagasc Advisory, which has the effect of undermining competition and equality in the commercial marketplace must cease as ACA members and other private advisors operate in the commercial advisory provision market.

ACA acknowledge the progress made in recent months and the commitment to reform AKIS within Ireland by the DAFM. ACA will support all measures to rectify the current position but we must establish the proposed actions/reform and our role in a new AKIS before the CSP is submitted to the EU Commission.

2. Forestry – the role of forestry in CAP 2023 - 2027

The ACA are in support of a strong element of forestry, woodlands and tree planting in the new CAP. It is the considered view of ACA that including such measures in the new CAP will facilitate expansion in the wider agricultural sector while helping make farms and farmers more resilient and sustainable.

Core Principles of this proposal:

1. Forestry, woodland and tree planting, both existing and new, must not only be compatible but also complimentary or of enhancement value to each applicant in the new CAP.
2. All forestry and woodlands, both existing and new, are assessed and treated equally, recognising the need for both commercial and environmental forestry and woodlands.
3. Existing qualification for basic payments on recently afforested land must be maintained, ensuring forestry and woodland is viewed as an intrinsic part of the farm.
4. There must be no penalty or repayment of any monies received by the applicant should the applicant's circumstances change and they wish to convert a greater portion of their holding to forestry and woodland during the duration of the new CAP.

There is an urgent need to integrate forestry activities in the new CAP in order to achieve multiple national and EU objectives, not least climate change mitigation. The current lag in the afforestation programme has brought into sharp focus the need to dramatically change the way in which Ireland's agriculture and forestry policies are implemented. The most important step in this process is to integrate forestry with the new CAP. The existing CAP has regrettably driven a wedge between forestry and other land uses. Farmers have perceived forestry and other land uses as being in direct competition as there is no effective integration. This is borne out by the current low afforestation programme in which it is estimated that farmers accounted for less than 40% of the area afforested in 2019. The lack of integration of forestry into CAP has resulted in both the farming community and the forestry sector suffering.

All proposed farm scheme interventions in CAP 2023 – 2027 must contain attractive forestry options for farmers and landowners. Forestry must be integrated to an extent that it provides an ideal partner, not competitor, delivering social, environmental and economic benefits to both the agricultural industry and wider society. Recent European initiatives in relation to Agriculture, Forestry and other land use (AFOLU) also need to be initiated in Ireland as part of the next CAP.

The environmental credentials of the forest industry are underpinned by the 312 million tonnes of carbon that is sequestered in Irish forests. This number is being added to by 3.8 million tonnes of carbon dioxide each year. Forestry is recognised as being our most significant potential carbon sink. In addition, our forests contribute to Ireland's renewable energy targets, our national biodiversity, recreational facilities, water protection and flood prevention. There is no way that Ireland will meet its forestry policy ambitions or mitigate its agricultural emissions without forestry providing a strong element in the new CAP. This will satisfy much of the requirements of the CAP relating to carbon farming and green investment.

The ACA believe the replanting obligation as the most significant barrier to new afforestation. Farmers will continue to stay farming rather than engage in the afforestation scheme as in farming there is choice, whereas in forestry there are no choices. Farmers are legitimately reluctant to make decisions for the next generation. Options to alleviate this barrier include:

- Introduce grant aid to cover the cost of reforestation, but with professional forester involvement.
- Introduce an option for an opt out of forestry for landowners at specific timeframes in the rotation.
- Introduce an annual public good payment for the increased biodiversity areas in both afforestation and reforestation. Farmers need to be properly rewarded for the public goods provided through forestry, woodland and tree planting.
- Remove any obligation for replanting in Agro Forestry.
- Extend the support period for Agro-Forestry to 15 years to match conventional forestry supports.

- Options are required to remove the obligation for a farmer to make decisions for the next generation, by making decisions for the current crop only.

ACA suggest the following be considered in relation to forestry, woodlands and tree planting in CAP 2023 -2027:

- Any farmer with forestry or existing woodland, subject to criteria, is considered to have fulfilled the full greening/biodiversity requirements.
- Ensure equal spread of new afforestation in every county by having each farmer plant an equal percentage of their farm
- Afforestation to be a compulsory element for derogation farmers.
- DAFM to fund a development officer for forestry, woodland and tree planting within the ACA.

Specific requirements for Forestry, Woodlands and tree planting in CAP 2023 - 2027

- Retain eligibility for BISS under prevailing conditionality
- Increased flexibility across all schemes for farmers and landowners in relation to forestry is an absolute must.
- DAFM use a single mapping system for forestry combining with BISS, AECM's etc. in order to eliminate mapping issues affecting/delaying owner's payments.
- Integrate with eco schemes and AECM's in both pillar I and II.
- Forestry incentives must be included in other schemes relating to:
 - Farm regeneration/supports for young farmers
 - Water quality
 - Emissions and Organic Farming
- Forestry consultants must be involved in areas such as:
 - Knowledge transfer schemes across all enterprises
 - Environmental training programmes
 - Training of Advisors initiatives
 - AKIS activities
 - Farmer training and Health and Safety initiatives
 - Carbon Navigator

- ANC payments must be payable on areas to be afforested
- Any redistribution of entitlements value must incentivise forestry as part of the redistribution.
- A woodland environmental planning grant is required to neutralise upfront costs for farmers and landowners considering afforestation
- Remove the replanting obligation for farm forestry but leave in place for commercial forestry investments.
- An upfront payment for farmers who afforest part of their farm with this payment to be based on carbon sequestration potential. The Woodland Environmental Fund is a good example of the benefits of an upfront payment to farmers.
- Review afforestation grant and premium rates in line with the current real-world costs and labour availability and alternative land uses.
- Introduce a differential in premium rates for farmers.
- Extend forest premium duration to a minimum of 20 years.
- No penalty to farmers for diverting to forestry from other schemes during the duration of the next CAP.
- A fit for purpose reconstitution scheme is required to deal with natural occurrences that are not insurable against.
- All mandated grants such as afforestation, forest road, woodland improvement, should not be subject to attachment orders where the person/entity the grant is mandated to is tax compliant.
- All ACA consultants to be remunerated to promote afforestation, ongoing forest management and Forest Management Certification to FSC and PEFC status.
 - Develop the ACA as a forestry promotion resource, with consultants remunerated appropriately.
- Forest Management Certification to FSC and PEFC status needs to be primed in the private sector.
- Existing forestry support measures to be retained but brought into line with the current real world situation.
- Re-imagine the design of the Agro forestry scheme to work in an Irish situation.