



# BEEF PLAN CAP COMMITTEE Submission

## **Response to the public consultation on draft interventions proposed for Ireland's Common Agricultural Policy Strategic plan 2023-2027 August/September 2021**

Beef Plan Movement would like to have the following points considered in the consultation process:

### **A level playing field; equivalent treatment for suckler farmers with dairy and tillage farmers**

Beef Plan believes a move to set a cap on the herd size over the reference period will have a detrimental impact on the national beef herd and disproportionately disadvantage the Suckler Beef farmer. This approach is inconsistent with the criteria and requirements set out for the Dairy and Tillage sectors. If the criteria, as set out, is implement the unique Irish Suckler Herd will be decimated; hastening the drive toward factory farm production and possibly encouraging imports from other regions, including those with greater greenhouse gas emissions per kg of beef or lower farming standards.

There is a school of thought prevailing in Ireland that Suckler Beef farming is more detrimental to the environment, and it appears that these misconceptions are being supported by the Department's approach to providing CAP support to the sector. More recent research at Oxford University in the UK has highlighted flaws in the GWP 100 model and submission from the University of California Davis<sup>1</sup> has urged European Policy Makers to carefully reflect on the use of the GWP100 convention for methane. The Intergovernmental Panel on Climate Change has recently discussed and accepted the science as it relates to GWP\*. This could have a considerable impact on the carbon footprint of suckler production, cutting greenhouse gas emissions per kg of beef by up to 50%. We urge the Department to review and analyse these reports and to incorporate the latest and most accurate science before implementing requirements that drive the wrong outcomes for Irish agriculture. The latest EU advice is that the top performing dairy cattle are producing 63% higher nitrates than the average suckler cow; there is a direct correlation between nitrates and emissions, this needs to be addressed.

The added bureaucracy of making the Board Bia Quality Assurance requirements compulsory for **all** herds regardless of size will add an unsustainable burden, placing extra hurdles on smaller farmers who promote bio-diversity and land use in remote areas. Well-managed grazing has a host of biodiversity, water retention, soil quality and sequestration benefits that will be lost if it's converted to arable.

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<sup>1</sup> <https://cabiagbio.biomedcentral.com/articles/10.1186/s43170-021-00041-y>



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## **Beef Plan wishes to challenge the link to genomic and Star Ratings for CAP payments**

Beef Plan is supportive of a move to a more scientific approach to managing herds and genomics. However, the movement respectfully requests an independent assessment of ICBF approach and metrics.

Beef Plan's key concerns are:

- There has been no independent validation of the efficacy of the models used and most of ICBF's justification is using the worst year of the decade (2014) as a base line, which overestimates any gains made in the meantime.
- There is no transparent approach on back testing of model outputs and model validation
- The compulsory requirements of the scheme confirm ICBF's bias, which in turn is used as confirmation of progress.

Based on phenotypic evidence in ICBF's own evaluations, Beef Plan note a disconnection between animal breeding values and their actual performance. This is evident at a national and individual level. Phenotypic data demonstrates clearly that older high performing sires are lower rated under the ICBF when compared with low reliability younger bulls. While there is a school of thought that discounts the values of these older pedigree bloodlines the history, quality and performance of these purebred genetics speaks for itself.

Beef Plan would also like to note that Suckler Herds have sufficient milk and all the other key criteria (weight, conformation, feed conversion, fertility etc) are met without adding genes from the dairy herd. The Star Rating approach favours first generation calves coming out of dairy herds; these can take over three generations of breeding to improve the terminal traits to an acceptable level.

It has never been more important to enhance the beef merits of calves from our dairy herd. While this may have an impact on milk quantity produced, it is a more sustainable route for farming in Ireland. Beef Plan would like to see more of an emphasis on dual breeds e.g. British Friesian cows that produce both good quantities of milk and calves that are of benefit to the Beef industry. There is also an environmental benefit as these calves can be finished up to 6 months sooner than purely dairy breeds. For example, should 100,000 cattle be finished 6 months earlier, due to improved breeding, there would be a corresponding decrease in methane emissions of approximately 5,500 tonnes per annum. It is worth noting that there are almost 2 million cows in our national dairy herd, all of which are producing higher nitrates/emissions than the average suckler cow.

The Beef Plan movement wishes to propose a representative on the board of ICBF to better represent the view of the Suckler Beef farmer and urgently request independent academic validation of the approach and output of the Star Rating system. We also recommend the introduction of more



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qualitative metrics (e.g. ease of fleshing, feed efficiency) before the Star Rating is used as a basis for determining CAP support for the Suckler Farmers.

## **PI 5) Producer Organisations in the Beef and Sheep Sector; better frameworks and support**

The Beef Plan movement supports and welcomes the role of Producer Organizations (POs) in the Beef Sector. However Emerald Isle Beef Producers would appear to be the only active farmer run PO in the country at present. Beef Plan respectfully requests the support of the Department of Agriculture on the following points:

- Creating a framework to ensure that the 'big 3' Meat Factory groups are required to deal with farmer run POs
- Supporting the PO in ensuring that collective effort has value (i.e. addition cents / per kilo)
- A funding subsidy towards the organisational costs of establishing and running PO
- Department support in delivering markets for PO beef, establishing a network of collection points and clearing yards for cattle, considering subsidies towards contract killing

## **PII 6) Suckler Carbon Efficiency Programme; The proposed requirements will contradict the EU objective of promoting a range of environmental, climate and biodiversity benefits**

The objective of Pillar II is delivering a range of environmental, climate and biodiversity benefits by supporting farmers to undertake appropriate actions. By its very nature the approach of the Beef Suckler farming promotes biodiversity, carbon being sequestered into land through grazing and low density animal stocking. Complimentary actions (for example planting trees) can be taken alongside Suckler farming. As mentioned above we urgently request that the Department of Agriculture dedicate resources to analyse more up-to-date data and research that refute the opinion the Suckler Beef farming is more detrimental to the environment than Dairy Farming<sup>2</sup>.

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<sup>2</sup> <https://repository.rothamsted.ac.uk/item/98470/nutritional-value-of-suckler-beef-from-temperate-pasture-systems>



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## **Payments made by the Department must be non-refundable**

An area of concern that has emerged in recent years is the Department looking for the return of funding from the various schemes. In some situations, this happens as many as 5 years after the farmer has received the funding. There are many situations where farmers enter schemes in good faith. Circumstances arise outside the control of farmers that result in them not meeting deadlines for certain actions to be carried out. There are also many situations where the hurdles to be crossed are far more cumbersome than first outlined. Beef Plan respectfully request that schemes should be designed and administered in such a way that the Department of Agriculture have mechanisms in place to check that actions are complete or can be completed to the Department's satisfaction before funding is issued. The schemes should be designed and administered, as far as possible, on a pay as you go basis or recouped on a pro-rata basis.

## **P1 4) Creating a barrier to entry for young farmers**

The Beef Plan Movement strongly believes that the eligibility criteria and conditions as set out will be a barrier to entry into the Beef Suckler sector for young farmers. Anecdotal evidence clearly demonstrates that no new farmers are joining the ranks, the incomes and support available to Dairy farmers are too attractive to make Suckler Beef farming a viable alternative. Beef Plan request that the Pillar II Suckler Carbon Efficiency Program be structured in a way that it attracts new young farmers and creates a level playing field and equivalence for Suckler Beef Farmers, Dairy Farmers and Tillage Farmers.<sup>3</sup>

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<sup>3</sup> [Farms and Farmers - CSO - Central Statistics Office](#) Agriculture typically has an ageing workforce. In 2016, around a quarter of farm holders in Ireland were aged 65 years and over. Just 5% of people were aged less than 35 years.



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**Key points in the consultation:** [gov.ie - Ireland's CAP Strategic Plan 2023-2027 - Public Consultation on Proposed Interventions \(www.gov.ie\)](https://www.gov.ie/en/public-consultation/consultation-on-proposed-interventions/)

As part of the ongoing process of designing the new CSP a set of proposed interventions outlines have been developed. These proposed intervention outlines build on the stakeholder input received to date, through the CAP Consultative Committee, as well as ongoing preparatory work undertaken within the Department of Agriculture, Food and the Marine (in particular, the work undertaken on the SWOT analysis and Needs Assessment required under the CAP Strategic Plan Regulation). Department of Agriculture request submissions on consultation by 27<sup>th</sup> August 2021 (revised to September 3<sup>rd</sup> 2021).

- P I 4) Complementary Income Support for Young Farmers (CIS-YF)
- P II 5) Producer Organisations in the Beef and Sheep Sector
- PII 6) Suckler Carbon Efficiency Programme
  - Measure A – participant who were in BDGP on 1.06 21
  - Measure B for those who were not in BDGP
  - Four mandatory actions:
    - ensuring a replacement strategy is in place, genotyping, weighing and data recording.
    - forage quality and faecal egg testing
    - participant will be required to attend a half day livestock handling course before the end of year 2.
    - where a participant is in the Dairy Beef Welfare Scheme, they will only be entitled to this payment in one of the Schemes.
  - Have submitted a BISS application in a reference year and continue to submit BISS applications on which all their lands are declared for the duration of the Suckler Carbon Efficiency Programme.
  - Have beef breed animals born annually in the herd in each scheme year of the measure.
  - There will be a historical reference year - *TBC*.
  - Be a member of the Bord Bia Sustainable Beef and Lamb Assurance Scheme
  - The scheme will prevent a participant increasing their Suckler Cow numbers over the course of the contract. However, in the exceptional cases where a farmer has had a very marginal increase and to ensure that small changes do not impact on farmer participation, the Department will allow some flexibility on this provision.



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- The number of Suckler Cows eligible per herd will be based on an historical reference year which will provide a ceiling for payment, but there will be scope to reduce numbers without penalty. Where a participant reduces their Suckler Cow numbers, this lower number will become their new Reference Number and they will be paid on this lower number going forward through the contract. The Reference Number may only be revised downwards.
- The Minister would reserve the right to rank and select cases for entry into the scheme in the event of over-subscription and/or reduce the rate payable per cow.



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## **Beef Plans original submission to the CAP 2023-2027 consultation considered the following key points:**

Beef farmers in Ireland and across Europe have seen their incomes stagnate as the costs of inputs have multiplied. Increased imports of beef exports from Countries with lower costs of production and without an equilibrium of standards on environmental and traceability criteria has further depressed beef prices in an already self-sufficient European market.

There is also a spectacular failure of legislators in Governments of member states and the European institutions as a whole to protect the incomes of the primary producer. Multinational supermarkets and meat processors have been allowed to create large oligopolies which have worked in tandem across Europe to maximize their profits at the expense of genuine farmers and in the absence of a proper European and Irish competition authority.

The Common Agriculture Policy was established to support farmers to produce high quality traceable food at a cost deemed affordable to consumers. Regrettably, the supports available to farmers have fallen well short of what is required to keep pace with increased costs of production.

A new conversation needs to be had amongst the stakeholders for a fairer distribution of the consumer price paid to farmers. There is no recognition for the uniqueness of the Irish Suckler Herd; in the respect for animal welfare and husbandry, the relatively limited impact on the environment compared to other beef production approaches, the respect for biodiversity.

The Beef Plan Movement wishes to put forward the following views in relation to CAP below. Beef Plan would like to see a fair targeted distribution of CAP payments to Beef Farmers.

A set of nine further specific objectives are established through which the general objectives are to be achieved are listed below which are clearly aligned with the Beef Plan Movement

1. Support viable farm income and resilience across the EU territory to enhance food security;
2. Enhance market orientation and increase competitiveness including greater focus on research, technology and digitalisation;
3. Improve farmers' position in the value chain;
4. Contribute to climate change mitigation and adaptation, as well as sustainable energy;
5. Foster sustainable development and efficient management of natural resources such as water, soil and air;





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6. Contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes;
7. Attract young farmers and facilitate business development in rural areas;
8. Promote employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry;
9. Improve the response of EU agriculture to societal demands on food and health, including safe, nutritious and sustainable food, as well as animal welfare.

The impact of CAP to date has not always had the desired impact as set out in the 9 specific objectives:

For example;

- Younger farmers are not incentivised to farm the land in a productive manner
- Land rents have been skewed by historic “CAP entitlements” rather than actual agricultural yield and no ‘discount’ achieved for the tax breaks offered to older farmers to lease land