



Independent Farmers Organisation of Ireland t/a



CAP Rural Development Division,
Agriculture House,
Kildare Street,
D02 WK12.

September 2nd, 2021.

‘Draft Interventions for CAP Strategic Plan’

The executive team of Independent Farmers in support of its membership would like to make our submission under the consultation process for Ireland’s 2023-2027 Common Agricultural Policy Strategic Plan (CSP). The deadline date for submission is tomorrow Friday, September 3rd, 2021.

Prior to outlining our position, we must state how disappointed we were that the Minister did not take up our recent request for a face-to-face meeting on these and other critical issues confronting Irish Farming.

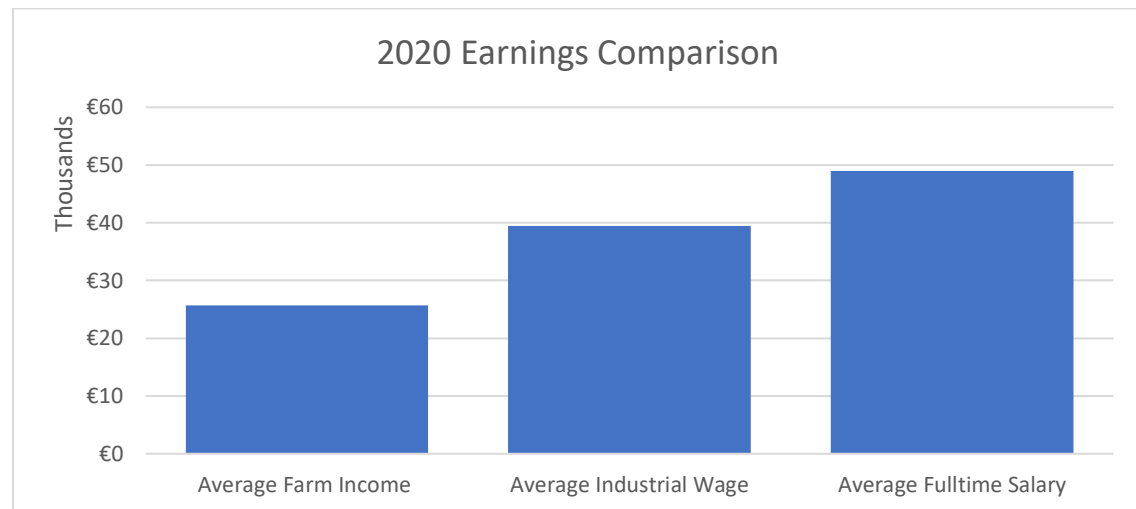
At Independent Farmers, we are supporters of and advocate for retention and development of the Irish family farm model. We see the family farm model as a key pillar of sustaining rural communities across Ireland. We want to see a restoration of family farm incomes that would enable a farmer to feed, clothe and educate their children without having to rely on off-farm income.

Given the hours of work put in by our members compared to those in full time employment, **we firmly believe that no farmer should be expected to survive on less than the average industrial wage.**

The following three figures are worthy of comparison;

1. Teagasc’s latest annual farm income survey suggests the average family farm income in the Republic of Ireland was €25,662 in 2020.

2. The most recently published statistics confirm that the average industrial wage in the Republic of Ireland is €39,500.
3. The average full-time salary in the Republic is now nearly €49,000, according to the Central Statistics Office (CSO).



Our members in Independent Farmers would suggest that their working weeks can range between 50 hours per week off peak increasing to 80 hours per week during peak lambing, calving, or harvesting, but it tends to average out at 68 hours across the full year.

When compared to those in fulltime employment farmers have no; paid holidays, no bank holidays, no sick pay, no incremental pay scales, no potential for promotion / progression, no automatic pension entitlement ...and the list goes on.

In a soundbite, “those who work twice the hours, earn half the money, and they also have no benefits. This is not sustainable.”

We in Independent Farmers believe that this comparison is entirely valid at this time as **“those who will ultimately decide our future farm income under CAP 2023-2027 are in a very privileged position”** and must look to bring back some element of fairness in their determinations if farming is to be viable and sustainable.

Beyond this introduction to “relative deprivation” let’s talk about CAP 2023-2027, we in Independent Farmers believe that if farming is to be viable and sustainable going forward the following elements must be delivered under CAP;

1. We support the call for €300/suckler cow per annum on the first 50 cows, with one caveat; that this amount is linked to CPI. We regard 50 cows as key if suckler enterprises are to be made viable.

2. With the annual kill figures falling year on year, we oppose any attempt to limit the number of suckler cows in any herd. This is akin to making certain farmers redundant but without a severance payment.
3. With the annual kill figures falling year on year, to ensure that sufficient farmers continue to finish cattle, a proposition which has been loss making for the last two years, a payment of €200 per head should be paid to beef finishers for all cattle slaughtered, without any conditions attaching.
4. We support a call for €50/ breeding ewes, up to a max. of 120 ewes, again linked to CPI.
5. The immediate ending of Bord Bia and DAFM levies on animals slaughtered.
6. We are opposed to any proposed distinction being made between “active” and “inactive” farmers. We believe that any such distinction is discriminatory as it can in many cases be related to “age” or “disability”, and therefore would be in breach of equality legislation.
7. The tax incentives need to continue for land leasing and the retaining of the single farm payment for those who lease their land must continue as it has afforded an opportunity for farmers in general to expand their operation, especially for dairy farmers. It also facilitates a farm succession.
8. Delivery of a realistic and attainable Environmental Scheme, which has a minimum payment of €10,000 + Existing Greening Amount per annum per farm. (The €10,000 must be in addition to the value of the existing greening payment for each farmer).
9. Without rebuilding farm incomes, the succession issue will not be resolved, leading to a poor uptake of any Early Retirement Scheme that might be put in place.
10. On the issue of convergence, we in Independent Farmers are supportive of 100% convergence from January 1st 2023.
11. In addition, we support the principle of front loading for farmers on smaller benefits.
12. To avoid any unintentional consequences around convergence and front loading, we are adamant that no farmer whose combined CAP benefits are less than €15,000 per annum should have their payment reduced.
13. We do not support the increasing of farm payments to offset the cost of employment of farm employees.
14. We do not support any initiative which provides for a subsidy to be paid to produce dairy calves.
15. If government are serious about addressing climate change, a 100% capital grant scheme needs to be introduced to;
 - a. Increase slurry and soiled water capacity, and
 - b. Installation of PV solar panels on farm buildings.

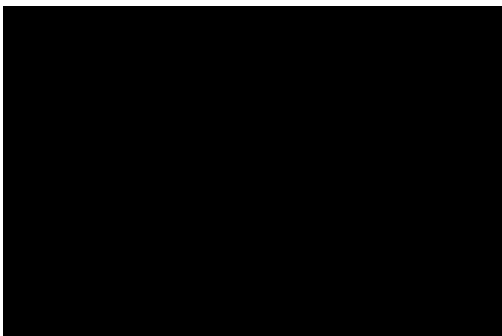
16. The benefit of CAP should not exceed €60,000 per annum for any farmer. This limit will aid the funding of the scheme.
17. There can be no linkage between any CAP Payments 2023 – 2027 and Bord Bia's Quality Assurance Scheme.

Beyond any benefits that might be derived from CAP 2023-2027, Independent Farmers want a categorical assurance from government that any carbon credits derived from sequestration are the sole property of the landowner and will not be claimed by the state or state agencies on foot of environmentally friendly actions subsidised under CAP 2023-2027.

In the 2020, the Irish government increased carbon taxes. At the time the government gave an undertaking that the proceeds would be ringfenced and made available for a decent environmental scheme for farmers. The time has now come to deliver on that commitment. Leakage into other sectors will not be tolerated.

Finally, Independent Farmers are not happy at the number of state agencies who are swinging off the CAP tit. Accordingly, we feel the non-farming spend in CAP needs to be cut by 20% to generate a fund to be made available to young farmers.

Going back to our introduction, by 2028, as we look back over CAP 2023-2027, and reflect on whether it was a success or failure? If the gap between farm incomes and the average industrial wage hasn't closed, we in Independent Farmers will view that as a failure.



This document was submitted via email to; CAPStrategicPlan@agriculture.gov.ie on Thursday September 2nd 2021.