

**IRD DUHALLOW SUBMISSION FOR DRAFT INTERVENTIONS FOR THE CAP**  
**STRATEGIC PLAN**

**02/September/2021**

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Ireland must ensure the fair distribution of CAP funding to working families in the Duhallow region and nationally by implementing capping at an effective rate of between €50,000-€66,000. This would re-direct additional funds to CRISS above the intended 10% for low income small to medium sized holdings. A 100% convergence of the value of entitlements must also be achieved through CAP post 2023 to assist in the fair and appropriate distribution of CAP funding for all farmers nationally. The objective of CAP going forward must be to prevent a small pool of farmers or land owners receiving a large pool of funding thus spreading the CAP funding across all farm sizes and equally across all genders leading to financial and gender equality in our sector. In addition, with respect to the definition of an active farmer a high proportion of CAP funds post 2023 must be directed towards farmers that actually work the land. The drawing down of funds via entitlements by non-active famers must be addressed through the proposed CAP 2023. The capping of the effective rate to between €50,000 - €66,000 would also address the cohort of farmers revered to as the “forgotten farmers” “constrained by the historical lower valued entitlements.

Gender equality in farming must be addressed in the new CAP particularly in areas of financial supports for new female entrants and training of these new entrants via FETAC level training courses. A monopoly currently exists within the system whereby a semi-state organisation is the only recognised provider of agricultural training for new entrants. Community Led Groups such as IRD Duhallow have a history of provided local support and training to rural communities and are in a position to provided additional FETAC courses including agricultural and environmental training to entrants into the sector. With respect to financial support via TAMS, or its equivalent under CAP post 2023, these grants must be available and drawn down on at the 60% rate in lieu of finishing an agricultural training programme within a prescribed period of time post draw down of funding. It is also proposed in this submission that the age or definition of a young farmer be described as anybody under the age of forty years. Farm

succession and farm transfers to lower the age profile of farmers in Ireland must be made a priority action under CAP. The extension of reliefs on the transfer of land post 2023 must be continued. Funding supports for farm modernisation must be increased for new entrants and the extension of the national reserve beyond 2023 are a priority.

The bar for environmental objectives of CAP post 2023 must be set high. Every farm if availing of CAP funding must meet minimum environmental standards to qualify. Conditionality for the proposed BISS must include a minimum biodiversity percent required by all holdings to avail of public funding and supports. In addition to protect and enhance the wider environment funded measures must include farmyard assessments of all holdings to prevent point source pollution, biodiversity surveys and biodiversity farm plans. These measures can be achieved through the proposed eco-schemes. Funded support for farmers for alternatives to the use of chemical fertilisers must be a priority. Additional funded measures including soil nutrient management, liming programmes and measures taken to enhance soil biological activity must also be rolled out as some part of the proposed eco-schemes. The results based approach has proved to be extremely successful. Through the innovative EIP projects Local groups and community led groups have succeeded in rolling out Agri-environmental projects nationwide. These groups must be further utilised in the next CAP for environmental training of farmers within their area. The further roll out of results based schemes with the support of community led groups must be further supported with CAP funding.

Transition to a circular economy is one of the primary objectives of environmentally focused programmes. However, the conversion to the use of renewable energies continues to be mired in planning obstacles. A more stream lined approach must be developed to allow farmers transition their business into the use of renewable energies such as the use of solar power. The provision of support and additional or top funding for farmers for the use of bespoke measures should be integrated into any proposed eco-scheme or Agri-environmental scheme. The roll of any such scheme with a focus on the use of bespoke measures to enhance the environment could be facilitated with the support of community led groups providing local solutions to local problems.

Some general solutions or examples of possible measures to reduce emissions and pollutant loss to water bodies from agriculture may include proposals for the introduction of CO2 ratings for agricultural machinery and possible funded projects to investigate the use of GPS tracking on fertiliser spreading equipment to prevent the application of fertilisers within prescribed

buffer zones. The introduction of a carbon credits system for farmers converting to Bio fuelled machinery or providing organic manures to anaerobic digester hubs could also be introduced. The removal of the licence for use of MCPA in the control of rushes must be identified as a priority action under the new CAP. Conditionality including the SMRs and GAEC must list the use of MCPA as a breach of the requirements of BISS. With regards the derogation application system the upper limit for derogation of 250 kgs organic N per hectare must be reduced further with the exporting of slurry if over this new lower limit prohibited. This would be more in line with a sustainable agricultural model which supports a healthy environment.

In summary, the role of community led groups in CAP post 2023 in the roll out of environmental schemes and programmes must be highlighted. These groups including IRD Duhallow play an integral role in the community and can facilitate many aspects of the proposed CAP reform from management of environmental and agricultural projects at a local level, agricultural training, knowledge transfer and implementation of bespoke measures to address specific environmental issues at a local level.

IRD Duhallow would like to acknowledge the members of the Agricultural Working Group of IRD Duhallow for their input into this submission.

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