

03 Sep 2021

Draft Interventions for CAP Strategic Plan

Introduction

The following submission is being made on behalf of the members of Irish Beef and Lamb Association (IBLA) – which comprises of a group of primary producers of beef and lamb. IBLA formally Beef Plan Movement (Agriland, 2021b) was recognised as a farm representative body in its own right by the Minister of Agriculture in August 2019 when it was agreed in consultation with the minister for agriculture at that time that beef farmer protests would be suspended to allow industry stakeholder talks to take place. Those talks ultimately concluded with the Beef Sector Agreement that was published by the by the Department of Agriculture, Food and the Marine in September 2019.

This submission is being made as part of the Ireland's CAP Strategic Plan 2023-2027 - Public Consultation on Proposed Interventions (Gov.ie, 2021) being facilitated by the Department of Agriculture, Food and the Marine.

The content of the submission has been established in consultation with our members who even though located nationally and complied with Covid 19 restrictions have contributed through conversations with county, regional and National committee members. Additionally IBLA have used digital means in conjunction with the farming press to conduct our own survey (Agriland, 2021c) with respect to some critical points in regard to distribution of funds.

The submission is being made having referenced the 'Ireland's CAP Strategic Plan 2023-2027 - Public Consultation on Proposed Interventions' document that has been published by the Department of Food agriculture and the Marine (DAFM, 2021) and 'Food Vision 2030 A World Leader in Sustainable Food Systems' (DAFM, 2021)

More specifically IBLA recommends the redistributing payments to farmers with less than 30 Hectares.

Eco-schemes

It is proposed that at least 25% of the Pillar I budget must be allocated to eco-schemes under Pillar I (a limited reduction on this figure is possible if Member States spend large amounts on environment and climate-related measures in Pillar II).

The position ratified by the trustees of IBLA is that in the absence of having specific details of the eco-scheme(s) being proposed it is not possible at this time to make a recommendation as to if the value of 25% should be increased or reduced as part of these CAP reforms. Further consultation will be necessary to conclude this point at a later date.

The absence of specific information on proposed Eco-schemes at this late stage of the consultation process is disappointing considering that 4 of the 9 key objectives of CAP reform are or have the ability to be addressed through Eco-schemes. The 4 specific objectives are:

- Climate Change
- Agriculture and climate mitigation,
- Efficient soil management
- Biodiversity and farmed landscapes,

Pillar II Interventions

There are 13 specific interventions listed in Ireland's CAP Strategic Plan 2023-2027 Public Consultation on Proposed Interventions however only some of which are of particular interest to IBLA recognising that we represent a subset of the farming community namely

Beef and Sheep farmers the interventions that we have would like to share an opinion on are included in the points below.

Agri-environment Climate Training

IBLA welcome any initiative involves continued professional development of farmers and this training is no exception to that point of view.

Whilst the key themes have been identified as outlined below it is not as clear if the learning objectives have been as well considered or if there is a requirement that these deemed as qualified to give the training will be required to have the content of the training approved prior to being authorised to provide the training.

- An introduction to the Green Architecture model under the new CAP,
- An overview of the environmental, water quality, biodiversity and climate challenges to be addressed
- An overview of health and safety as part of good farm management,
- An overview of the agri-environment climate measure, its regulatory basis, the objectives of the scheme and funding,
- Information on the individual commitments

IBLA recommends that to ensure the training is consistent and uniform across those providing the training that the content of the training program be approved prior to the trainer being approved to participate in the program.

Experience with previous schemes is that the effectiveness of the training is heavily dependent on the content shared with the participants and this content should therefore be reviewed for suitability.

Additionally a form of learning assessment should be required to be completed by participants to ensure that there has been active participation.

Areas Facing Natural Constraints (ANC)

IBLA consider a critical element to the proposal on ANC interventions to be that of stocking density. A holding that meets the minimum stocking levels (grazing requirement) set at 0.15 livestock units per hectare must only be capable of being fulfilled with Cattle or Sheep. Horses and Donkeys should specifically be listed as being excluded from stocking density calculations.

The definition of an active farmer should also be very clearly defined and ensure that the person in both in spirit and practice an active farmer. IBLA considers that an Active farmer is a person that is exposed to financial risk directly and as a consequence of their farming activities.

IBLA request that the upper area thresholds for each category be increased above those proposed to reflect a farmed area required to ensure that viability of the farm based on anticipated income levels from the farming enterprise.

Producer Organisations in the Beef and Sheep Sector

IBLA support any intervention related to the promotion of existing and new Producer Organisations in the Beef and Sheep Sector. Financial support for establishment of the Producer Organisation however is only one element. Operational supports for the initial number of years trading in conjunction with legislative supports that prohibit discrimination by processors that prevent the establishment of Producer Organisations in the Beef and Sheep Sector is also required.

Suckler Carbon Efficiency Programme

IBLA welcome elements of this intervention however IBLA have a fundamental objection to the proposed capping of the number of cows permitted to be kept on a participating holding. Farm stocking rates are determined by the nitrates directive at 170Kg. N/Ha subject to derogation - this is the only limiting factor that should apply to the number of animals that can be kept on a farming enterprise.

The reference year should be selected by the participant from a range of recent years nominated by the DAFM.

Once the reference number of animals have been established payment should be made on the number of reference animals only – any subsequent increase in cow numbers in the herd must be farmed to the same environmental standards as the reference number of cows in the herd however no additional payment will be made on these animals.

Farmers should not be required to be a member of the Bord Bia Sustainable Beef and Lamb Assurance Scheme. This is currently a discretionary scheme and should remain so. The attractiveness of joining the Bord Bia Sustainable Beef and Lamb scheme should be sufficient in its own right and on its own merits to encourage farmers to join the scheme.

Knowledge Transfer Programme

IBLA welcome any initiative involves continued professional development of farmers and this training is no exception to that point of view.

Similar to the points raised with respect to Agri-environment Climate Training it is not clear if the learning objectives have been as well considered or if there is a requirement that those deemed as qualified to give the training will be required to have the content of the training approved prior to being authorised to provide the training.

IBLA recommends that to ensure the knowledge transfer is consistent and uniform across those providing the training that the content of the knowledge transfer program be approved prior to the trainer being approved to participate in the program.

Experience with previous schemes is that the effectiveness of the training is heavily dependent on the content shared with the participants and this content should therefore be reviewed for suitability. Additionally as already suggested above for Agri-environment Climate Training a form of learning assessment should be required to be completed by participants to ensure that there has been active participation.

CAP consultation process observations

IBLA whilst excluded from the stakeholder meetings that took place to date regarding the CAP consultation process we have made a number of observations.

The virtual townhall meetings were a very welcome initiative undertaken by the DAFM and IBLA recommend that such virtual town hall meetings continue to be used for future farmer consultations even when Covid 19 restrictions are no longer in place. Having participated in a number of similar EU organised events this appears to certainly be the direction the digital transformation is likely to follow.

The use of surveys is also a welcome development and one that IBLA strongly encourages for future consultations. One criticism however is the lack of promotion that was done for the CAP survey that IBLA used the farming press to promote with the limited resources that we have. (Agriland, 2021a)



References

Agriland (2021a) *IBLA Department Questionnaire on CSP*. Available at: <https://www.agriland.ie/farming-news/farmers-urged-to-complete-department-questionnaire-on-csp/>.

Agriland (2021b) *IBLA 'Rebranded' Farm Organisation*. Available at: <https://www.agriland.ie/farming-news/ibla-rebranded-farm-organisation-outlines-priorities/>.

Agriland (2021c) *IBLA Reveals Results of Online Survey on CAP*. Available at: <https://www.agriland.ie/farming-news/ibla-reveals-results-of-online-survey-on-cap/>.

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DAFM (2021) Available at: <https://assets.gov.ie/180467/b3149735-f61f-4db0-a5dc-1b4531dc2b31.pdf>.

Gov.ie (2021) Available at: <https://www.gov.ie/en/publication/cf1c0-irelands-cap-strategic-plan-2023-2027-public-consultation-on-proposed-interventions/>.