Submission on Irelands draft CAP Strategic Plan 2023-2027

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Executive Summary

The new CAP: less money, but more environmental obligations

The new Common Agricultural Policy (CAP) for the 2023-2027 period was agreed by the EU Council, Commission and European Parliament last June. It increases the climate and environment requirements on farmers, decreases the budget available to support their incomes, and repurposes payments needed for income support making them conditional on environmental action. Its proposed implementation through the draft CAP Strategic Plan currently subject to consultation has failed to avail of flexibilities that could have lessened the negative impact on farmers' incomes while optimising the environmental output. The EU policy and its Irish interpretation leave farmers, many of whom in Ireland are dependent on their CAP payments for their income, faced with lower payments but having to fund more costly actions, including some which will challenge their productivity. In addition, the new CAP seeks to redistribute payments, regardless of the fact that they are far more equitably distributed among farmers in Ireland than in most other Member States.

Implementation must not create more unviable farmers

In the implementation of the new CAP through the Irish CAP Strategic Plan Interventions for 2023-27 – which are the subject of the current consultation and of this submission – it is essential that the Minister and his officials at the Department of Agriculture, Food and the Marine (DAFM) do not create more unviable farmers, but would instead focus on supporting farmers in vulnerable sectors.

IFA's submission on the Proposed Interventions in the Draft CAP Strategic Plan 2023-27

This comprehensive, detailed submission from IFA addresses **all aspects of the 25 interventions (nine under Pillar I, 16 under Pillar II)** proposed by DAFM as part of its draft CAP Strategic Plan 2023-27. It also proposes **an additional Pillar II intervention** targeted to Cattle Rearing and Finishing farmers.

Last May, IFA identified **Six Key IFA Objectives** which have underpinned our views on how the Strategic Plan should implement the new CAP:

1. Minimise the impact of **Eco-Schemes** on each farmer's basic payment.
2. Minimise the level of internal **Convergence**.
3. The Government must deliver on its commitment to **maximise national co-financing** of CAP Pillar II schemes.
4. Ensure sensible design and practical implementation of **Good Agricultural Environmental Conditions (GAECs)** – previously known as Cross-Compliance, now Conditionality.
5. Provide an appropriate definition for **Active Farmers** reflecting a minimum economic output, while phasing out long-term leasing of entitlements.
6. The Government must honour the Programme for Government **€1.5bn Carbon Tax/REPS 2** commitment, but not raid it to discharge its Pillar II national co-financing commitment.

These principles were not fully adopted by the Minister and his officials in DAFM. The CAP Strategic Plan must ensure economic and social sustainability in line with the recommendation in Food Vision 2030.

In addition to IFA's six key points, the following issues arise from the outcome of the EU negotiations and the specific proposals made by DAFM in the draft CAP Strategic Plan:

- The implementation of the EU CAP legislation through the Irish draft CAP Strategic Plan will disproportionately impact a cohort of our most active farmers and risk making them unviable. The impact on these farmers must be mitigated by decisions at National level.
- The DAFM need to do a proper economic assessment of the impact at farm level of their proposed Draft CAP Strategic Plan. The recently published data from the joint research committee in relation to the EU Farm to Fork Strategy highlights the potential implications of elements of this plan.
- The Eco-Schemes application must be part of the BISS application and the payment must come at the same time as the BISS advance payment.
- The vulnerable sectors beef, sheep and tillage must be prioritised for support within Pillar II.
- As outlined in previous submissions, IFA is proposing a minimum payment of €300 per suckler cow, €30 per ewe along with the introduction of a new Cattle Rearing and Finishing Scheme under Pillar II. The current proposals do not guarantee suckler farmers a similar per cow payment to what they are currently getting through BDGP and BEEP-S. The proposed Sheep Improvement Scheme has a lower annual budget allocation (€20m) than was originally allocated to the Sheep Welfare Scheme.
- IFA is seeking the introduction of a comprehensive and ambitious Agri-Environmental scheme with a payment of up to €10,000 available for all farmers. The The scheme will only support 50,000 farmers which is not sufficient to meet likely demand and opening of the Scheme on a Tranche basis will lead to a gap between completing GLAS and commencement of AECM.
- IFA rejected any 'caps' or 'limits' on the number of cows or animals at individual farm level or nationally, we acknowledge the removal of the relevant clause from the proposed Suckler Carbon Efficiency Programme.
- IFA rejects any requirements being imposed on farmers to join Bord Bia Quality Assurance Schemes. Farmers participate in these schemes to get a better return from the market. IFA acknowledge the removal of this requirement from the Sheep Improvement Scheme but it must be removed for the Suckler Carbon Efficiency Programme also
- The so-called 'Forgotten Farmers' should be catered for in the new programme. IFA has previously submitted a separate set of proposals to DAFM to address the concerns of these farmers.
- The additional eco scheme measures, announced subsequent to the publication of the draft CSP is a positive development. Further eco scheme measures are required to ensure all farmers have the option to participate fully in eco schemes. To this end, IFA has included addition potential eco scheme measures in this submission.

Overall the Minister must mitigate the cut in BISS by reducing the percentage allocated for eco schemes to significantly less than 25% using the council rebate option. In addition to ensure the viability of vulnerable sectors dependant on direct payments (suckler, beef, sheep and tillage), additional national funding is need for associated pillar 2 schemes.

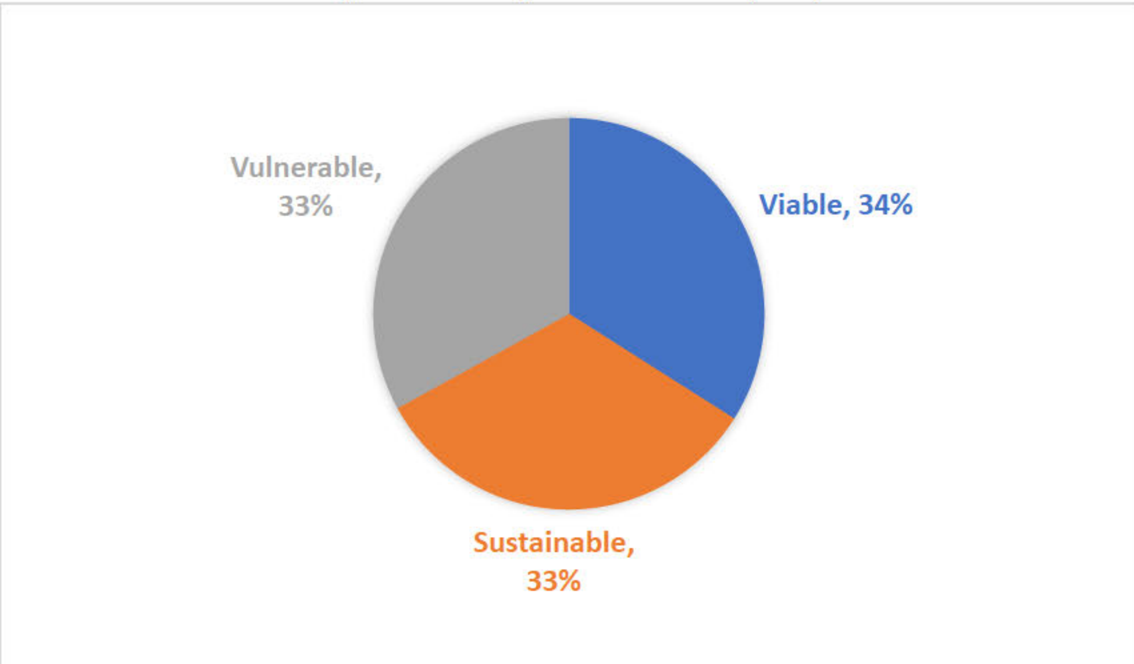
Introduction

The Irish Farmers' Association is the largest national representative organisation in the country, with over 72,000 members. It is the recognised voice of Irish farmers in Europe and internationally. IFA represents farmers with Government, agri-business and retailers; lobbying and campaigning for improved conditions and incomes for farm families. We represent farmers in all sectors through our democratic structure of 29 County Executives and our ruling body the National Council, on which each county and each commodity is represented. Through our Brussels office and affiliation with COPA-COGECA, we maintain a full-time presence at EU level on behalf of Irish farmers. The Association promotes the ongoing development and competitiveness of Irish Agriculture and the food industry, which is making an important contribution to Ireland's Economy.

Farmer Viability

Figure 1 illustrates the level of viability of Irish farmers as analysed in the Teagasc National Farm Survey. It clearly shows that, in 2020, two-thirds of farmers were less than viable. A farm business is deemed to be viable if the farm income can remunerate family labour at the minimum agricultural wage and provide a 5% return on capital invested in non-land assets (e.g., livestock/farm machinery). A farm household is considered sustainable, even if the farm business is unviable, if the farmer or spouse are in receipt of an off-farm income. A farm household is considered to be economically vulnerable if the farm business is not viable and neither the farmer nor the spouse work off-farm.

Figure 1: Viability of Irish Farmers (2020)



Source: Teagasc National Farm Survey 2021

Dependence on Direct Payments

The importance of the Common Agricultural Policy (CAP) to Irish farmers cannot be overstated. Without the support CAP provides in the form of Direct Payments, the vast majority of Irish farmers would be unviable. Analysis of the Teagasc National Farm Survey for the last three years, as outlined in Figure 2, shows that on average 74% of farm income comes from Direct Payments, while Direct Payments make up between 118% and 159% of dry stock farmers' total income.

Figure 2: Value of Direct Payments (DP), Average Farm Family Income (FFI) & Contribution of DP to FFI (Average of last 3 years)

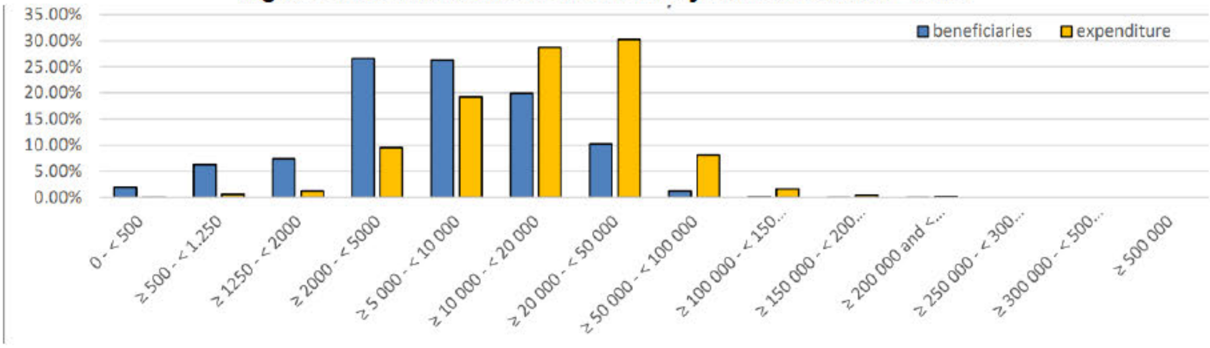
	DP (€)	FFI (€)	DP contribution to FFI (%)
Dairy	20,604	67,170	31%
Tillage	24,318	35,292	69%
Cattle Other	16,988	14,378	118%
Sheep	19,128	15,487	124%
Cattle Rearing	13,956	8,785	159%

Source: National Farm Surveys 2018, 2019 and 2020, Teagasc (adapted).

Equity in Current Distribution of Direct Payments in Ireland

The distribution of Direct Payments in Ireland is less concentrated than in the EU as a whole, with 20% of Irish farmers receiving 56% of Direct Payments in 2015. In comparison, the average across the EU is that 20% of farmers receive 82% of Direct Payments. Payments in Ireland are a little more concentrated than land. This shows significantly greater equity in the distribution of Direct Payments in Ireland.

Figure 3: Distribution of Direct Aid by Aid Amount in EURO



Source: Analytical factsheet for Ireland: Nine objectives for a future Common Agricultural Policy. European Commission 2019.

The new CAP measures, and the manner in which DAFM proposes that they are implemented in its Draft CAP Strategic Plan, involve a significant degree of redistribution of farm payments. In light of the vulnerability of the majority of Ireland's farmers and the high level of dependence of farmers' incomes on Direct Payments, DAFM must commission an analysis of the economic consequences of the new CAP measures on farmer incomes and viability prior to finalising the proposed CAP Strategic Plan interventions. DAFM must also ensure that the implementation of the new CAP in the 2023-2027 period does not create more unviable Irish farmers.

IFA submission on the Draft CAP Strategic Plan 2023-27

The following outlines the IFA's submission on the proposed interventions in the draft CAP Strategic Plan (CSP). While engaging with the consultation process in the format imposed by DAFM, we continue to urge the Minister to engage in genuine negotiation with IFA to represent those most seriously impacted by proposed CAP reforms. [CL1]

PILLAR I INTERVENTIONS

Proposed reforms to Pillar 1 will see Greening replaced by Eco-Schemes, which will be funded by a cut of 25% to every farmer's Basic Payment. Also, Pillar I, as currently being proposed, will feature significant levels of other forms of payment redistribution, through Convergence, CRISS (Complementary Redistributive Income for Support and Sustainability) and Capping.

General IFA views

- As stated in our introduction, it is imperative that the proposed CAP reforms do not create further unviable of farmers.
- It is disappointing that DAFM have not completed a full economic impact assessment of their proposed CAP policies prior to the submission of Ireland's CAP Strategic Plan by year end. IFA is calling on this assessment to be completed without further delay.

1 - Definitions

- **Eligible hectare**
  - There can be no differentiation between the 30% of currently ineligible land it is proposed to reintroduce to eligibility and existing productive land.
  - To allow more eligible hectare into the agricultural area, DAFM should examine the impact of increasing this measure to 40% to assess the difference this would make to biodiversity features.
  - Allowing up to 40% of all land applied to be considered eligible simplifies the proposal provided there is no significant impact on payment levels, or unintended distortion of the land market.

- **Active farmer**
  - Only genuine active farmers must be eligible to claim payments in the CAP.
  - The Minister has not adequately grasped the nettle of defining the active farmer, with the bar set too low, particularly on stocking density. IFA reiterates that activity must be defined through a minimum output/sale value from the farm and stocking density, with a different, lower level for farms in Areas of Natural Constraints (ANC).
  - A higher bar to qualify as an active farmer would allow to redirect payments to generational renewal initiatives.

- Regulating the leasing of entitlements can make a significant contribution to focusing the benefit of payments on active farmers. Any review must not have a negative impact on land mobility. The revised regulations should also take account of exceptional cases such as family ill-health or bereavement where leasing of entitlements will still be permitted.
- Multinationals and large corporations must be excluded from CAP payments on all lands, including forestry.

2 - Conditionality – Good Agricultural and Environmental Conditions (GAECs)

Any changes in GAECs cannot undermine the economic agricultural activity taking place on Irish farms. The DAFM needs to adopt a flexible and facilitative approach when implementing GAECs at a national level and they must be sensibly designed and pragmatically implemented. This approach must minimise the impact of GAECs on farmers and their farm businesses.

- **GAEC 2:** IFA is concerned that this GAEC may impose additional measures on farmers that will negatively impact the production capability of Irish farms. Peatlands and wetlands currently make up a substantial amount of Ireland's productive land area. Much of this land is under agricultural use with an estimated 300,000 hectares of permanent grassland on drained, carbon-rich soils. Ploughing restrictions on peat soils must not prevent reseeding where it ensures pastures are rejuvenated, improving the response to fertiliser application, as well as facilitating multi species swards (MSS) in these areas.

- **GAEC 4:** It will potentially have a negative impact on the production capacity of Irish farms and therefore Irish farm incomes. To avoid this, the width of buffer strips required along water courses must be minimised given the field size of a typical Irish farm. The optimisation of the management of existing buffer strips should be prioritised over increasing the width of such strips. We note that the Draft CAP Strategic Plan warns GAEC 4 will be subject to the ongoing 4th review of the Nitrates Action Plan. Currently, buffer strips are not a requirement of non-nitrates derogation farmers, and this should continue. In addition, to avoid loss of grazing land and shelter for animals, there must not be any requirement to fence buffer strips. The option of a derogation on areas of significant dewatering should also be explored

- **GAEC 7:** IFA still holds that the available options to reduce the impact of GAEC 7, as allowed under the principle of subsidiarity, would have allowed the Minister to exempt mixed and grassland farms and minimise additional requirements for arable farms. We call on the Minister to revisit this decision. The existing crop diversification known as '3 crop rule' measures must continue in its current form during the 2023-2027 programme. Temporary equivalence from crop diversification via cover crops in the new agri-environment scheme as per the previous Regulation 1307/2013 should also continue. It is important that the classification of horticultural crops as arable or otherwise does not cause issues in relation to farmers complying with this particular standard. In relation to proposals regarding crop rotation exemptions may need to be applied to protected horticulture crops defined as arable but which are generally not rotated.

- **GAEC 8:** The EU requires Member States to devote a minimum of 4% for non-productive areas or features on arable land only. The DAFM must not go beyond the EU requirement and extend it to all agricultural land. Simply applying the requirement to devote a minimum of 4% for non-productive areas or features to all farms without first mapping all farms to determine the actual percentage currently in existence is unacceptable. This is vital for farmers who have limited unproductive areas and would find it difficult to comply with this DAFM proposal. This would risk taking out a portion of their productive land which contributes significantly towards generating their income.

To achieve the ambition beyond the minimum EU requirement under GAEC 8, DAFM could on an annual basis ensure a national minimum 4% for non-productive areas and features.

Extending the ambition of increasing the share of non-productive land or features beyond the EU requirement could alternatively be achieved through the Eco Schemes and/or the agri-environmental scheme in Pillar II.

As part of the annual assessment, a list of non-productive areas and features, along with their proposed weightings must be published in advance, and agreed with farmers prior to implementation.

The requirement to control invasive plant species, which is very costly and difficult, should be removed from the GAEC. Farmers have previously received very necessary financial support to eradicate these plants through EIPs, Leader projects of local authority funds, and this approach should continue to be funded.

IFA welcome the recent commitment by DAFM that Natura lands will contribute to 'space for nature' calculations. However, we have concerns regarding suggestions that it will carry a weighting factor of less than 1.

Eligible forestry, ineligible forestry, native woodlands, commonage, privately owned hill and non-active turbary plots within holdings must all be included in the 'space for nature' calculations.

Finally, it is vital that non-productive areas and features, while calculated as space for nature under GAEC 8, continue to be classified as eligible land for Pillar 1 payments and Nitrates stocking rates calculations.

- **GAEC 9:** Reseeding in Natura 2000 sites must continue to be allowed, as was the case previously. This is vital for farmers who wish to incorporate a multispecies sward into permanent grassland and continue sward rejuvenation which improves response to fertiliser thus facilitating reduced application.

3 - Basic Income Support for Sustainability (BISS)

- **Convergence**
    - IFA is concerned that reducing the payment of farmers through Convergence of their per hectare BISS payment, in combination with the redistributive impact of other measures, runs the real risk of creating more unviable farmers without contributing to improving the viability of those who are already economically vulnerable.
    - IFA is disappointed that the implementation of the minimum Convergence level of 85% has not been accompanied with efforts to fully utilise the flexibilities allowed to minimise damaging redistribution through other elements of CAP.
- **Capping**
    - It is disappointing that the draft CSP does not propose that labour costs are deducted from BISS before Capping comes into effect. IFA believes this should be revisited and

all labour costs, including the farmers' own labour value and family labour, are deducted as permitted by EU legislation.
    - Leased-in entitlements should also be exempted in the Capping calculation where these payments are returning to the owner of the entitlements.
    - IFA also proposes that partnerships should be permitted to avail of multiple BISS caps to reflect the fact that there are 2 or more entities are involved in the farming operation.

- **Leasing of entitlements**
    - To ensure that only active farmers benefit from CAP supports, without disenfranchising those who rely on leased land to run their farming business nor affecting negatively land mobility, IFA has been seeking a reform of regulations governing the leasing of entitlements. This was outlined in our earlier submission on CAP interventions. The DAFM proposal to provide for such a measure is welcome, however the revised regulations must take account of exceptional and Force Majeure cases such as family ill-health or bereavement where leasing of entitlements will still be permitted.
    - We believe this provision is coherent with, and should be included in, the definition of active farmers.

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

- Generational renewal is a crucial element in CAP and has been reaffirmed among the nine over-riding objectives for CAP 2023-27.
- IFA welcomes the continued support for young farmers provided in the draft CAP Strategic Plan.
- The 'Forgotten Farmers' should be eligible to apply for CIS-YF and the National Reserve. The funding for this does not necessarily have to come from CAP funds; instead it should be funded by the National Exchequer.
- Note: the 'Forgotten Farmers' are a group of farmers who lost out in the last CAP due to a combination of missing out on the Young Farmer Scheme, the National Reserve and the higher rate of grant aid in the TAMS scheme. This followed the removal of young farmer supports (Installation Aid) due to cuts in public expenditure by the Government following the last recession. These farmers were then unable to qualify for the young farmers' supports introduced under CAP 2015 because in many cases they had been farming for five years or more.

5 - Eco-Schemes

- Eco-Schemes, as proposed, will impact farm incomes excessively, due to their design which does not allow farmers to recoup the initial losses to fund the eco scheme payment pool.
- The Council Rebate option, which was negotiated by the Minister, must be implemented to reduce the financial impact on farmers with higher than average entitlement values. This negative impact is compounded by the design of Eco-Schemes, which are proposed to be paid at a flat rate per hectare.
- Under the final CAP Reform agreement, the Minister was given flexibility to reduce the level of funding allocated to Eco-Schemes from 25% to possibly as low as 12.5%, depending on allocation of EU co-financing funds. Ireland's level of environmental spending in Pillar II gives the

Minister the capacity to substantially reduce the cut in every farmer's Basic Payment to fund the Eco-Schemes to well below the 25% the Minister for Agriculture is currently proposing.

- The Minister fought for this flexibility to be included in the final CAP agreement. Other Member States with high environmental spend under Pillar I, such as Finland and Austria, are planning to use it. Our Minister must avail of the flexibility in the Regulation. This flexibility will also help to reduce the cuts to payments of farmers with higher value entitlements.

The following are the general principles previously stated by IFA with regards to Eco-Schemes:

- As applications must be made through the BISS application, payments must also be made simultaneously with BISS
- Irish farmers already have very strong credentials on agri-environmental measures. 33% of Ireland's land is farmed under Agri-Environmental Climate Measures compared with an average of 13.4% across the EU-27 member states. More recognition should be given to the level of actions undertaken by Irish farmers to date.
- Eco-schemes must support farmers producing food, and reflect the higher costs involved.
- Eco-Schemes should present participating farmers with a menu of practical actions including measures relevant to different sectors regardless of intensity, income vulnerability and geography.

Our views on the newly proposed Eco Scheme interventions, including the most recent additional measures and flexibilities, are as follows:

- The proposed measures, with the additional flexibilities and extra options put forward since the publication of the Draft CAP Strategic Plan are a step in the right direction, and should help more farmers engage with the Scheme. However, the list of options remains too limited.
- IFA welcomes the change in language, from "non-productive area" to "space for nature" which has more positive connotations.

Measure No. 1

- In light of the 4% minimum requirement under GAEC 8, farmers should be able to avail of this measure at a lower percentage of their land than the 7% proposed. There should be no requirement to fence off Space for Nature areas.

Measures No. 4 and 4.a:

- Planting of native trees is a notifiable action for farmers in Natura 2000 areas. Therefore, Natura lands must be given a full weighting under 'space for nature' calculations under that eco scheme measure.
- Farmers who farm at the boundary of a commonage area should have 100% of their wall/hedge attributed to them. Farmers must be able to plant hedges along existing external boundaries regardless of whether the farmers have access to both sides or not.
- The option to plant the full 5-year requirement of trees in year 1 should be available to farmers for the following reasons:
    - It would allow for the better and more uniform establishment of a hedgerow

- Planting in one go would allow to secure better value for contracting work completed and save time
  - Optimise benefits for biodiversity by enhancing the level of habitat establishment earlier in the CAP programme.
  - Farmers would of course continue to be required to maintain these hedgerows/trees for the full duration of the programme. IFA's analysis of the EU Commission's Q&A document, published in July 2021, questions B2 and B6 suggest that this proposal would be fully compliant with the Eco-Scheme regulations, which allow for multiannual approaches, including changes to the nature of the commitments undertaken annually.

- Double hedging should be allowed to meet the requirement with reduced linear meterage. The type of hedging accepted must provide farmers with multiple practical options.

Measure No. 5:

- This should be widened to include farmers who have received training on the efficient use of fertilisers, including the efficient setting of spreaders, and who have GPS units on their tractor, while not on their spreader. GPS spreaders are impractical for most farmers as they are cost-prohibitive for the average-sized farmer.

Measure No. 6:

- Soil sampling and nutrient management plans are more than single-year commitments. Soil sampling and subsequent liming should be completed over a period of 3 years, thus allowing the Eco-Scheme measure to be counted as a multi-annual scheme for at least 3 consecutive years. The participants should be allowed to select it again on the fourth year and restart the process.

Measure No. 7:

- An extra rotation should be allowed, to include such crops as fodder beet, used by tillage farmers as a break crop. Also, fodder crops, which are grazed between December and February, should also be included as a catch crop. The option should be given for farmers to grow two rather than one break crop to reach the requirement for 25% of the arable area. Winter and spring variants of the same break crop (e.g. winter and spring beans), must also qualify for the 25% area requirement.

Measure No. 8:

- The inclusion of red clover in the sward should be added to the option to sow a Multi Species Sward. Farmers who devote 12% of their area to MSS in one year instead of 6% should be considered to have fulfilled the full Eco Scheme requirement for the year in question and receive full payment for it. Also, MSS set in one year being maintained in subsequent years should count as fulfilment of the Eco-Scheme for subsequent years.

Proposed additional measures:

IFA proposes the following additional measures are considered:

- The Commission, in their guidance on the implementation of Eco Schemes[1], outlined that eco schemes could be designed that address Animal Welfare and/or Antimicrobial Resistance. It also outlined that these schemes can be paid on a Livestock Unit (LU) basis. Accordingly, IFA propose the inclusion of the following eco-scheme:
    - An annual herd health plan with associated actions for the year with payment based on a per Livestock Unit basis.
    - This eco scheme would allow recognition of the higher costs associated with the higher LUs on farms.
    - The herd health plan would focus on disease prevention and promote prudent and responsible use of antibiotics.
    - The plan would be costed based on LU's; the higher the numbers of animals on the farm, the higher the implementation and compliance cost that could be projected and therefore the higher the payment level available in the Eco scheme.
    - This would allow a variable eco scheme payment with farmers with higher levels of livestock receiving a higher payment.
    - The objective is that all farmers would be treated equally in this as they would be eligible to receive the same rate per LU.

- Farmers farming in Natura 2000 areas, organic farmers, and farmers practicing mixed grazing should automatically qualify for an Eco Scheme.
- The use of nozzles which reduce spray drift by 90% should also be allowed as a qualifying Eco-Scheme measure.
- The installation of Solar Panels and other renewables should be considered as an Eco-Scheme.
- The EU Commission published in January 2021 a list of potential Eco-Schemes. On the basis of this document, IFA suggests adding a number of extra options as follows:
    - Feeding plans, access to water, suitable housing
    - Extended grazing, to recognise the long grazing season in Ireland compared to other EU countries
    - Grass measuring
    - Milk recording
    - Breeding practices which contribute to animal robustness and longevity (for example of cows/ewes)
    - Practices relating to the Teagasc Marginal Abatement Cost Curve (MACC) – for example LESS, use of protected urea.
- The current proposals/measures in relation to eco schemes do not include any measures specific to horticulture crops. The objective of the eco scheme is to allow all farmers to participate. Additional measures must be included in the eco scheme to allow farmers in the horticulture sector to access this income support.

6 - Apiculture Programme

- IFA supports the continuation of interventions to support research in the apiculture sector at the proposed budget level.

7 - Sectoral Intervention in the Fruit and Vegetables Sector (Producer Organisations)

- The rules governing the Sectoral Intervention must be much less bureaucratic than the current PO rules are and designed in a much more farmer/grower friendly manner.
- There must not be an increased demand for environmental actions within the Operational Plans for POs in the horticultural sector. The maximum which should be spent on environmental measures in operational programmes should be no greater than 15%.

8 - Coupled Income Support for Protein Aid

- The IFA acknowledges the increased allocation of €7m to the Protein Aid Scheme which is a positive development.
- There is a strong need for a more ambitious Tillage Scheme in Pillar II, which factors in the full complexity of the tillage business. While the proposed Straw Incorporation Measure, which builds on the current pilot, is a step in the right direction, a more comprehensive scheme is required (further detail in later section).

9 - Complementary Redistributive Income Support for Sustainability (CRISS)

- CRISS was devised as a proposal within the context of a European distribution of CAP payments which is significantly less equitable than Ireland's (see Figure 3 in introduction).
- While acknowledging that CRISS has been presented as beneficial for the majority of farmers, the modelling exercise by DAFM shows only a minor increase in payment for those who benefit and a major loss for many of those who will have payments reduced.
- IFA appreciates acutely the need to support vulnerable farmers, IFA believes there are appropriate and effective ways to do so, especially through Pillar II (as outlined later in submission)
- It is imperative that farm partnerships are permitted to avail of multiple CRISS payments, to reflect the number of partners within the farming business.

PILLAR II INTERVENTIONS

Pillar II must provide support to farmers in the more vulnerable sectors, namely beef (cattle rearing, suckler farming and other types of drystock cattle enterprises), sheep and tillage. The new Pillar II proposals make it possible for Member States to co-fund schemes beyond 57% and Ireland must fully avail of this opportunity.

General IFA views

- Ireland must maximise its national co-financing of CAP Pillar II schemes, as per the commitment to do so in the Programme for Government, utilising the option in the new CAP provisions to increase the level of national financial contribution.
- In 2020, the National Exchequer contributed over €300m in funding towards agri-schemes. These included Areas of Natural Constraints (ANC), Green Low-Carbon Agri-Environment Scheme (GLAS), Beef Data and Genomics Programme (BDGP), Targeted Agricultural Modernisation Scheme (TAMS), BEEP-S (Non-pillar II), Sheep Welfare scheme, Locally Led schemes, NPWS Farm Plan, Organic Farming scheme. These schemes are a vital support for our vulnerable sectors.
- As outlined in our previous submission, IFA is targeting a combined suckler cow payment of €300/cow and ewe payment of €30/ewe. It is vital that the Pillar II funding be increased to ensure that the schemes, including AECM, the Suckler and Sheep Schemes can deliver those critical levels of support.
- The Straw Incorporation Measure is a welcome response element to the needs of the Tillage sector, but a comprehensive, ambitious scheme must go further. The sector will require an enhanced budget in Pillar II, in recognition of the fact that it was disadvantaged by Greening and the Ecological Focus Area provisions in the current CAP, and will further be severely impacted by Convergence and Eco-Schemes deductions.
- Leakage of funding from all schemes must be avoided and the direct return to farmers must be maximised.
- Payments must be based on incentives and supports in addition to the costs incurred/income foregone calculations recognising the importance of direct support funding to the sector.
- Farmers who are farming land which is designated as Special Areas of Conservation (SAC), Special Protected Areas (SPA) and Natural Heritage Area (NHA), and/or commonages must have priority access to all schemes and must be paid at a higher rate.

1 - Agri-Environment-Climate Measures (AECMs)

- IFA made clear the importance that AECMs appeal to all farming sectors and geographical areas.
- The scheme should be broad enough to facilitate as many farmers as possible, and realistic enough so that each applicant can adopt a set of measures that suit their farm. Every farmer in the country should be able to join and obtain a payment. 50,000 participants, as presented by DAFM in the Draft CAP Strategic Plan, is not nearly ambitious enough.
- There is a real issue of transition for farmers completing GLAS and the commencement of AECM being caused by the tranche funding approach. Providing for only 25,000 farmers to be accepted

in 2023 is simply insufficient. In light of the importance of GLAS/AECM payments to farmers' incomes, it is essential that all applicants under all tranches be accepted and paid in 2023, or that GLAS contracts are extended to bridge the gap.

- The AECM Scheme must deliver €10,000 to farmers and facilitate higher payments where existing schemes that farmers are participating in are returning a higher farm payment.

- **IFA views regarding the General (individual farmers) and Co-operative (landscape approach) parts of the scheme.**
  - All farmers who wish to participate in the General scheme must be given the opportunity to do so.
  - The Minister must allow for the payment per farmer to reach €10,000. Failure to do this will reduce the ability of farmers to deliver for the environment.
  - IFA welcomes that, as requested, prescription-based measures offer a large list of options. However, it is critical that it would recognise existing features and continue to enhance earlier schemes.
  - The results-based measures can have a major negative impact on payments. Those applicable to Commonage, Low-Input Grassland, Multi-Species Ley, Low Input Peat Grassland and the Protection of Rare Breeds must be realistic and suitable for the relevant sectors, and provide for simple scoring which is easily defined. They must also be practical and achievable: for example, a requirement under REAP for sheep farmers to maintain buffer strips falls foul of the fact that sheep graze to levels that prevent indicator species growing.
  - The AECM scheme general should have a broader list of measures such as an optional measure providing for soil aeration.

- **IFA views specific to the Co-operative measure (landscape approach) part of the scheme.**
  - The eight areas referenced in the draft CAP Strategic have not yet been shared by the DAFM for the co-operative measure / landscape approach. The co-operative measure must not be forced on farmers. Farmers must be given the option to choose to participate in either approach.
  - IFA is very concerned that the design of the Co-operative aspects of the scheme could lead to leakage of CAP funds to third parties for administrative costs,
  - The AECM Co-operative Option aims to replace GLAS and EIPs. However, some farmers in the relevant areas will experience a major cut in payment from AECM by comparison with what they received, combined, through GLAS and EIPs, which is unacceptable and counterproductive in terms of environmental output.

- **Other issues**
  - Farmers who are farming land which is designated as Special Areas of Conservation (SAC), Special Protected Areas (SPA) and Natural Heritage Area (NHA), and/or commonages must have priority access to all schemes and must be paid at a higher rate.

- Organic farm scheme participants must be included in other agri-environmental schemes/AECM. In the last CAP, 16 measures in the GLAS schemes excluded organic farm participants from participating.
- There needs to be greater integration between agri-environment and forestry schemes. Farmers that participate in agri-environment schemes must not be penalised or excluded from removing parcels of land so that they can plant during the term of a programme.
- It is vital that agro-forestry and riparian planting schemes introduced under Pillar II are excluded from the forest licence system, as well as the replanting obligation. There is potential to introduce an optional measure for farmers to set aside areas for biodiversity enhancement on the farm, where natural regeneration could be encouraged and/or hedgerow width could be extended.
- The Department should consider introducing a new Forest Environment Protection Scheme[1] as a listed action under this measure to encourage more diverse planting on farms.
- The AECM scheme should provide measures allowing intensive farmers in high nitrates and high phosphates catchment areas to participate.
- The AECM scheme must recognise existing carbon sequestration on farms and reward farmers for this.
- The Traditional Farm Building Scheme which was available to GLAS participants should be reopened and must be open to all farmers and not restricted to AECM participants
- Under the current draft proposals, conventional orchards or measures pertaining to this sector are not included. The CSP states that this scheme will be open to all active farmers in the country. Conventional orchards must be included otherwise farmers in this sector will be excluded. Apple growers must be eligible to qualify for the AECM. Apple growers missed out on GLAS, this should not happen again

2 - Agri-Environment Climate Training

- While IFA supports appropriate training of farmers in matters relating to the new climate and environmental asks in CAP, it is crucial that the training of trainers would not give rise to leakage of CAP funds away from farmers. It would be more desirable to ensure that all Teagasc and private farm advisers would be trained to integrate those elements in their normal advisory engagement with farmers.

3 - Straw Incorporation Measure (SIM)

- It is essential that the tillage sector, which has been shown to be vulnerable, has a specific, ambitious and comprehensive scheme beyond the proposed Protein Aid Scheme under Pillar I.

[1] *A FEPS scheme was introduced in 2007 that allowed farmers in REPS to plant and paid farmers a top up payment for increasing the diversity of species in the plantation.*

- While the SIM scheme, building on the current pilot, is a welcome first step, it is vital that other schemes in Pillar II be made available for tillage farmers, particularly as they will be severely impacted by Convergence and a flat Eco-Scheme payment. Such schemes are essential to maintain, let alone increase, the current area under tillage as outlined in the Government's AgClimatise strategy.
- An enhanced GLAS + style scheme with a higher maximum annual payment is one potential option to help offset the loss of income resulting from Convergence.
- A specific 'payment for practice' scheme to promote measures which improve nutrient management and soil health in long term tillage soils should also be introduced under Pillar II. Such a scheme, similar to the Agricultural and Horticultural Soils Standard being rolled out in the UK[2] would be potentially very beneficial.
- IFA welcomes the decision to continue the inclusion of oilseed rape in the SIM Scheme at the payment rate of €150/ha for 2023-2027
- Consideration should be given to broadening the straw incorporation measure to include orchard prunings, as it is in a very similar vein, and achieves similar aims (increasing soil carbon).

4 - Organic Farming Scheme

- The increased funding for the Organic Farming Scheme in the draft CAP Strategic Plan of €256m is welcomed. While the proposed allocation is acceptable, specific payment rates must be addressed.
- To be adequately ambitious and endeavour to deliver on the Programme for Government target of 7.5% of UAA to be farmed organically, it is essential that the scheme pays at least €520/ha for conversion farmers, and €470/ha flat payment for established farmers.
- The current proposed payment rates will not attract new entrants nor encourage existing organic farmers to remain in organic enterprises. Delivering a progressive and sustained increase in the share of Irish organic farmland by 2027 will require a reliable and attractive OFS for existing organic farmers and new entrants that supports different land-use types (e.g., grassland, tillage, horticulture etc).
- In addition to the above rates targeted payment of €300 per Organic suckler cow and €30 per Organic ewe should also be provided for as part of the scheme.
- In terms of land-based payments recent EU-wide research conducted by the Thuenen Institute of Farm Economics found that the overall spend for organic farming support payments in Ireland was almost 50% below the EU average (Lampkin, 2021)[3].

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[2] *https://www.gov.uk/guidance/arable-and-horticultural-soils-standard*

[3] *Lampkin, N., Sanders J (2021 in press) Organic support payments in the European Union. Thünen Working Paper. Braunschweig: Thünen Institute of Farm Economics.*

- The new and ambitious OFS must have payment rates that fully reflect the income forgone and costs incurred of organic production i.e €520 for in conversion farmers and €470 for fully converted farmers.
- Regarding eligibility, IFA believe that all farmers should be allowed access to the scheme. The previous points-based system was flawed and discriminated against smaller land-based farms.
- The OFS scheme must be more accessible to farmers, re-opened more regularly and for longer periods of time compared to that under the current CAP. This would give both farmers and food businesses more opportunities, flexibility and a certain level of predictability to exploit the latest market trends
- Organic farm scheme participants must be included/catered for in other agri-environmental schemes/AECM. Organic farmers should not be excluded for carrying out actions under the OFS.
- The rate of grant aid under capital investment scheme must also increase to 60% to allow for the investment commitment of all organic farmers to their farming system.
- The scheme must be open to all applicants irrespective of commodity farming/sector, to achieve the organic farming objectives set out under the Programme for Government.
- The minimum stocking rate for hill farmers must be reviewed. It is currently set too high for this commodity given the constraints experienced thus excluding them from the scheme.
- Non-CAP funds must be used to grow market demand for organic products – as outlined in Food Vision 2030 – and protect market premiums to fairly remunerate farmers. Failure to address market demand while promoting production growth runs the real risk of damaging the market, with organic produce ending up in conventional channels at the farmers' cost.
- As outlined earler in the submission, organic farmers should automatically qualify for Eco-Scheme payments; 'Eco by definition'.

5 - Areas Facing Natural Constraints (ANC)

- The ANC scheme must be co-funded to the maximum by the National Exchequer.
- The budget to support ANC must be increased to €300 million per annum.
- The existing categorisation as defined under the ANC review of 2019 must be maintained.

6 – Early Stage Support for Producer Organisations

- Producer Organisations must contribute in practical and tangible terms to improving the position of farmers in the food chain, empowering them to have greater negotiation weight including on prices, specifications and production conditions.
- Measures under this scheme must be farmer friendly, keeping bureaucratic requirements to a minimum. The current beef producer organisation model is overly bureaucratic and not sufficiently funded.
- The proposal recognises the sheep sector in Ireland has led in establishing and, critically, maintaining producer groups in support of farmers selling lambs.

- These groups, through the dedication and investment of members, have played a vital role in supporting sheep farmers and have enabled significant numbers of them to remain in the sector.
- The scheme must be available to these existing groups with minimal impact on the well-established and proven structures they currently operate.

7 - Suckler Carbon Efficiency Programme

- Irish suckler farmers operate one of the most environmentally sustainable beef farming systems in the world and are a critical component of beef production, within the higher environmental standards being imposed by the EU in the new CAP.
- The proposed scheme is very disappointing for its lack of ambition to provide meaningful support to the sector. As IFA has outlined previously, the scheme requires a funding commitment that delivers €300/cow in support for the Suckler Cow sector, including to Organic farmers. Costings must be increased/updated and additional practical and beneficial measures defined for suckler farmers.
- The funding proposals for suckler farmers in the scheme represent a reduction of €28m from the existing annual allocation to the sector.
- The Minister must honour the commitment given publicly at the mart meetings to IFA officers that all applicants will be accepted into the scheme, and that all cows in the scheme will be paid on at the rates announced of €150 for the first 10 cows, and €120 for all other cows. To honour this commitment, the reference in the scheme to a ranking and selection/linear reduction in case of oversubscription must be removed.
- The facility allowing reduced numbers without sanction must be aligned with reduced targets in these years for the replacement strategy and genotyping targets.
- The 80%, 85% and 90% targets for calves born sired by 4 or 5-star bulls must be reduced and simplified.
- The Dam requirement targets of 50%, 60% and 75% must be reduced.
- Genotyping of all live calves should be accepted for the genotype measure without reference to a % of the reference number.
- The % requirements for these measures must be based on the last full animal. For Example, 80% of 27 cows is 21.6, the target must be 21 cows.
- The compulsion for membership of the Bord Bia Sustainable Beef and Lamb Assurance Scheme (SBLAS) as a condition for eligibility for payment is also strongly rejected. SBLAS is recognised as a market requirement, and farmers who participate in it must be rewarded from the marketplace. However, it is not an environmental scheme and farmers already measure carbon in existing schemes.
- Establishing the reference period must ensure the actual levels of activity on farms are accurately reflected in the scheme.
- The scheme must allow participating new entrants to the sector to build up their herd and have this recognised in the reference numbers.

- The scheme must ensure farmers who have made significant progress in their herds to-date are not penalised for this progress in the targets set.
- The costs associated with maintaining the status of the herd must be recognised as this can often be more difficult than achieving performance increases from lower levels.
- The scheme must be run on an annual basis with no retrospective application of penalties on monies already received for failure to reach targets or carry out measures as the scheme progresses.

7a - IFA Proposal for a Cattle Rearing and Finishing Scheme

- This proposed scheme would be based on, but expand the scope of the Dairy Beef Welfare Scheme to include farmers who rear and finish weanlings and stores.
- The scheme must deliver meaningful payments to farmers who rear and finish weanlings and stores from suckler farms. It requires a budget allocation which can deliver at least €100 per animal.
- The proposed measures in the Dairy Beef Welfare Scheme Growing Stage should be extended as they are as relevant and important for animals reared from suckler farms as they are to dairy bred animals.
- The scheme must be available to all farmers who rear cattle, including those from suckler herds.

8 – Training to implement the Suckler Carbon Efficiency Programme

- While training farmers to optimise the uptake and outcome of the SCEP is important, it is concerning that this does not give rise to a payment for the farmers, who are deemed to have been paid through the SCEP itself.
- This means that this scheme creates a real risk of leakage of CAP funds away from farmers. To prevent this, we would propose that payment for participating in training is made directly to the farmer, and the farmer can then pay the trainer.

9 - Dairy Beef Welfare Scheme

- This scheme is an important first step to support and optimise the welfare of dairy calves and their beef value in the farming and food chain.
- [CL2]Grass measurement could be included in this scheme as a possible action under the Growing Stage measure.

10 - Sheep Improvement Scheme

- As outlined previously, the scheme must have a funding allocation to deliver €30/ewe to all participants for all ewes applied on, including for Organic farmers.

- The DAFM proposals lack ambition to provide the opportunity for participants to generate €30/ewe and must be amended through increased/updated costings and additional practical and beneficial measures for sheep farmers.
- Shearing must be included in the scheme. The collapse in the wool market has made shearing economically unviable and including it into the scheme would meet a number of key CAP objectives. A critical animal health, welfare and parasite control measure, shearing also generates a naturally sustainable product in the wool which the scheme would ensure can be presented from farms in optimum condition for further use.
- The reference period must reflect the actual levels of activity on farms. New entrants to the sector must be allowed time to establish their flocks while participating in the scheme and have this recognised in the reference numbers.
- In the menu of actions, we recommend the following:
    - The requirement to genotype rams must recognise the home bred genotyped/sire verified ram. It must not be necessary to purchase a ram to meet this requirement in the scheme.
    - The use of AI must be recognised and facilitated in the programme to meet the requirements.
    - Farmers must not be required to notify the intended year when they will implement the ram genotyping measure at the start of the scheme. Farmers must be allowed to carry out this measure when it is suitable for the farm based on management practices and availability of eligible/suitable rams.
    - Farmers with mixed flocks must be allowed to choose the option most suitable/beneficial for their farm.
- The DAFM proposal to deduct the net economic benefit associated with the actions in calculating the support rate is not acceptable. The support rate calculations must be based on cost incurred/income foregone. Economic benefits are subjective, often aspirational and when they occur may not persist for long beyond the initial investment.

11 - European Innovation Partnership (EIP-AGRI) Operational Groups

- EIP Operational Groups can play a valuable role in peer-to-peer awareness raising and in helping farmers better understand and improve the sustainability of farm practices.
- Examples such as the BRIDE, Hen Harrier, or Pearl Mussel EIPs have enabled groups of farmers to adopt and share practices to improve biodiversity, among other environmental benefits.
- The continuation of EIP is welcome in the new CAP, however, they must be more readily scalable to benefit directly more farmers, and there must not be leakage of funds away from the farmers concerned.

12 - On-farm Capital Investment Scheme (previously TAMS)

- All items currently eligible for grant aid in TAMS II should continue to be eligible for grant aid in the new On-Farm Capital Investment Scheme

- LESS equipment comes at a high cost for farmers but delivers a high return for the environment in terms of reduced emissions and nutrient loss. In this respect, the separate ceiling provided for LESS equipment is a welcome first step. Increasing the rate from 40% to 50% for LESS attachment is also positive, but all LESS related investment should be grant aided at the highest rate of 60%.
- The increased grant rate of 50% for organic farm investments is also a positive development. As per previous submission, we are seeking an increased grant aid rate of 60%, to help increase the area under organic farming.
- Including women farmers between 40 and 55 for the higher 60% grant rate available for young farmers is a positive step, but is extremely limiting with fewer than 5,000 women qualifying. To support more women in farming, IFA proposes that women (i) with at least a level 6 qualification or who have been head of a farm holding for at least three years, (ii) up to 67 years old and (iii) join a formal farm partnership with a minimum level 6 qualification, should qualify for the 60% grant rate.
- The 'Forgotten Farmers' (defined earlier) must also be eligible for the higher rate of aid provided for young farmers.
- A Dairy Equipment Investment Scheme to support dairy farmers must be reinstated in the scheme.
- Grand aid for nutrient storage equipment must be available, including for farmers who have insufficient slurry storage. If we are to realise our environmental ambition, it is vital that farmers with insufficient storage are eligible for the scheme.
- Grant aid should also be available for slurry covers to assist farmers in achieving future compliance requirements.
- A separate amount of ring-fenced funding should be provided for tillage farmers to invest in slurry storage.
- Soiled water tanks, coverings for open yards and heat detection aids should also be eligible for investment.
- GPS spreaders and sprayers should be included as eligible for grant aid.
- A wide range of farm safety equipment must be included in the scheme and the application procedure for farm safety must be simplified.
- Road underpasses should be eligible for grant aid as they not only contribute farm safety but also to road safety.
- Cubicle mats and slat mats should be eligible for grant aid. Mats add to animal comfort which contributes positively to animal performance therefore contributing towards reducing the age of slaughter, which has an added environmental benefit.
- Fixed animal handling equipment such as the 'Inspect 4 rollover crate' for cattle, or a 'turn-over crate for sheep'. This would contribute positively to on farm Health and Safety.
- Cattle fencing should also be eligible for grant aid.
- The following additional tillage equipment should be eligible for grant aid under the CIS Scheme

- Shallow narrow spaced tine cultivators for light stubble cultivation and straw incorporation.[4]
  - Straw harrows and implements for mechanical destruction of stubbles or cover crops.[5]
  - Weighbridges and weigh cells for trailers and loader buckets
  - Harvest weed seed control combine attachments for growers with large grass weed populations.[6]
- The Irish equine sector, though largely unaided through CAP, is internationally recognised as one of the leading producers of top-quality sports and thoroughbred horses, and as a leader in the horse racing industry. Welfare is of paramount importance to horse owners and a number of grant aid measures would ensure horse welfare remains a priority for the Irish equine sector. The economic viability of many farmer-owned equine operations will be safeguarded. Investment in necessary and modern equipment will assist in keeping Ireland at the forefront of world equine stage. We would propose that the following infrastructures and facilities would be eligible for CIS grant-aiding:
  - Horse stables; Manure and soiled water storage facilities; Indoor and outdoor arenas (and surfaces); Lunge rings; Gallops; Fencing; Handling stocks; Horse walkers, treadmills and swimming pools; Cross-country courses / training facilities; Outwinter pads; Holding & handling facilities

13 - Collaborative Farming Grant

- This scheme, which supports farm partnerships, must be available to existing partnerships as well as newly formed ones.
- The scheme differentiates between partnerships involving older farmers and others. To promote generational renewal, partnerships involving an older farmer should qualify for twice the maximum €1,500 support.

14 - Continuous Professional Development (CPD) for Advisors

- It is crucial that the new environmental and climate-related asks in CAP would be integrated in all advisory services from Teagasc or private advisors.
- It must be integrated with, not take precedence over, the crucial farming business and economics, technical efficiency and best practice which underpin the advisory services legitimately expected by farmers to help them run their businesses optimally.
- There must be no leakage of CAP funds away from the farmers who receive, and pay for, the farm advisory services.

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[4] *Example:* https://www.horsch.com/en/products/soil-cultivation/cultivators/cruiser-sl

[5] *Examples:* https://claydondrill.com/straw-harrow/ *or* https://www.horsch.com/en/products/hybrid-farming/harrows/cultro-tc

[6] Example: http://www.zurnuk.co.uk/product/seed-terminator/

- Ongoing availability of one-to-one advisory is crucial. Advisors must receive training as part of CPD which keeps them focused on the individual business considerations of their clients.

15 - Knowledge Transfer Programme

- The increase in the number of meetings which farmers have to attend in a year from 5 to 8 compared to the last KT scheme adds time and travelling costs which must be offset by an increase in the payment rate.
- The decision to base KT groups on local rather than sectoral needs may leave farmers short-changed where they have limited access to one-to-one advisory service to deal with the specificities of their business. It also leaves organic farmers out.
- Payment under the KT scheme must be made to the farmer, who will in turn pay the facilitator.
- A blend of local meetings and national events in the last KT scheme worked well for farmers in terms of sharing knowledge and should be part of the next Knowledge Transfer scheme.
- Given the recent growth of digital literacy and remote meetings, the option of remote online meetings should be explored for KT events.
- Organic farming must be catered for in the new KT programme.
- The equine sector must also be eligible for the new KT programme.

16 - LEADER Programme

- IFA welcomes the continuation of the LEADER programme for the socio-economic contribution it makes in rural areas.
- The LEADER Programme is a key rural development tool for supporting the economic, social and environmental development of rural communities, by providing the resources necessary for rural communities to support their own development and to create capacity at local level.
- For 30 years the LEADER Programme, delivered by Local Development Companies, has maximised the drawdown and impact of EU funds, to create jobs in rural areas, and develop rural communities in keeping with the LEADER approach, which has been evaluated as very successful by EU institutions.
- The aim of the LEADER Programme 2023-2027 as identified in the draft CAP Strategic Plan is to continue to support a community-led local development (CLLD) approach to rural development by animating and funding initiatives that emerge at a local level to address local challenges and needs.
- A sustainable budget of €389 million must be provided for the LEADER Programme 2023-2027 to drive 'bottom-up, community-led' investment to create and sustain employment in rural Ireland, provide funding in the rural environment and support climate change mitigation initiatives in rural communities as well as the identified high-level ambitions of LEADER 2023-2027 outlined in the draft CAP strategic plan. IFA proposes that funding, in addition to what's proposed in the Draft CAP Strategic Plan, be provided by the Department of Rural and Community Development (DRCD).

Conclusion

The final CAP strategic Plan will shape the future of Irish farming for five years and beyond. Accordingly, it is vital that this plan supports farmers across all sectors regardless of location, size or intensity.

This CAP Strategic Plan has focused on environmental sustainability with little or no consideration for the economic or social consequences for farm families. CAP must support farmers in vulnerable sectors, especially farmers in all beef systems, sheep and tillage farmers.

In light of just how vital CAP payments under Pillar I and Pillar II are to the livelihoods of Irish farmers and to date, DAFM must urgently carry out a comprehensive economic impact assessment, beyond modelling, with particular focus on the proposed inter-connected measures which either aim to or result in payment redistribution.

This CAP reform will have significant ramifications for the incomes of farmers and their economic viability for the coming years. The new CAP measures cannot further stress on-farm incomes and challenge farm businesses' economics. The new CAP cannot make more farmers unviable, while failing to contribute sufficiently towards already vulnerable farmers.

Submitted by the Irish Farmers' Association.

8th December 2021

Ends.