



IRISH
NATURA & HILL FARMERS
ASSOCIATION (INHFA)

**Submission from the
Irish Natura & Hill Farmers Association
(INHFA)
to
Department of Agriculture Food &
Marine
draft CAP Strategic Plan 2023-2027**

(December 2021)

INHFA Seeking fairness not favouritism



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Introduction

Outlined in this document are proposals from the INHFA that if adopted will help to deliver on the key objectives outlined for Ireland's CAP Strategic Plan (CSP) 2023-2027.

As a key stakeholder representing farmers that in previous rounds of CAP have been left on the margins, the input from the INHFA through this process has been vital in drafting a plan that addresses past imbalances and works towards a CAP that is fair for all farmers.

However, in the current draft of the CAP Strategic Plan, there are still significant areas of concern. We welcome the opportunity to inform the final drafting of the document by setting out our recommendations to create a workable document that achieves the objectives of supporting viable farm incomes and competitiveness, strengthening the socio-economic fabric of rural areas, and by contributing to the achievement of environmental and climate objectives.

Specific Points of Concern:

The INHFA have significant renewed concerns about the ongoing status of agricultural area and agricultural activity based on what is outlined under 4.1.3 Eligible hectare of the Irish CSP Regulation.

PG ELP is reliant on the continued grazing of livestock to ensure status as an agricultural area.

With regard to Natura lands, the INHFA will not accept Natura Lands being included in the calculation for the Space for Nature measure as this measure only caters for non-productive features and areas.

The INHFA are calling for a standalone Natura 2000 Eco-Scheme measure that gives equal status to the legal designation and productive agricultural land in the delivery of a public good.

On the AECM Co-operation – the inclusion of a results-based scorecard on extensive commonage lands is unworkable and risks farmer's income from an Agri-Environmental Scheme. The collective approach also risks the potential for farmers to access the scheme as individuals.

On any results based scorecard under the AECM it is vital that agricultural area is on equal status with the habitat.

Definitions & Conditionality

Agricultural Activity

Under 4.1.1.1 definition of Agricultural Activity the INHFA are calling for it to be determined *in a way that it allows to contribute to the provision of private and public goods through one or both of the following;*

(i) Production, rearing or growing of agricultural products, including harvesting, milking, breeding animals, for farming purposes. (or cultivation including by way of paludiculture, which is omitted from the text?)

(ii) Maintaining an agricultural area in a state which makes it suitable for grazing or cultivation without preparatory action going.

In addition to what is proposed in the draft CSP, we must ensure that agricultural activity is defined in a manner that acknowledges the provision of both private and public good at a baseline level. 'Agricultural activity' should provide for both, the production of agricultural products and the maintenance of the agricultural area as part of our shared environment. Farmers should have the option of both activities so they can adjust to local conditions.

Agricultural Area

As outlined in the draft CSP this will follow the definitions in the current CAP programme which we welcome. The proposal to include rushes within permanent grassland is a positive, pragmatic development.

Maintenance of Agricultural Area:

As currently set out under 4.1.1.2, there is a risk of farmers being advised to implement actions that may not be necessary nor compatible with environmental objectives in a given case – an example being rewetting which for certain farmers may not be the right action in the right place.

In addition to this, the INHFA want to add "Established Local Practices" to the existing list.

Eligible Hectare

The INHFA have significant renewed concerns about the ongoing status of agricultural area and agricultural activity based on what is outlined under 4.1.3 Eligible hectare of the Irish CSP Regulation.

Under 4.1.3.1 definition of eligible hectare, the INHFA are calling for the removal of the second last paragraph on page 295 **"as a result of the undertaking of activities, duly justified by a competent individual, for environmental, biodiversity or climate-related reasons"** as it has no basis in the EU underpinning regulation.

Under 4.1.3.1 definition of eligible hectare the second bullet point (page 294) the INHFA does not accept a year to be skipped where the agricultural area status is achieved under established local practices on permanent grassland.

Under 4.1.3.1. definition of eligible hectare, the INHFA are calling for the removal of all references to "competent individual" as it has no definition or legal basis in the EU CAP legislation.

Under 4.1.3.6 rules on inclusion/exclusion of ineligible features, the INHFA are calling for rock outcrop or scattered rock to be included in the list of landscape features. It also needs to be included in the list under **Retention of Landscape Features** on page 253 or the list under **non-productive features** on page 252

The INHFA are seeking clarity on the following questions;

What application of the Birds and Habitats Directive would result in that area no longer complying with the definition of eligible hectare?

What penalties will be applicable if ineligible features in the parcel are 31% or more?

On "Eligible Hectare", "General Definition" (page 296) where it states "As regards permanent grassland with scattered ineligible features, fixed reduction coefficients shall be applied to determine the area considered eligible" can DAFM clarify what this means?

Young Farmer

We agree with the detail outlined in the draft CSP. However, there is growing disquiet around the qualifying criteria for young farmer supports; specifically, the requirement for a Green Cert to avail of these. This is detailed further with additional proposals on young farmer interventions.

Active Farmer

Under the proposed definition to quantify a minimum level of agricultural activity, there is a minimum stocking rate for grassland farms like the ANC (0.15/LU/ha).

- It is vital that this stocking rate which will also apply to the ANC; and to measures in the Eco-schemes doesn't undermine any farmer's ability to get access under any of these schemes or undermine a potential grazing measure in the proposed AECM.

- For farmers on certain land types that have a maximum or prescribed stocking rate allowance of less than 0.15/LU/ha there needs to be recognition and a mechanism to ensure they continue to meet the criteria of an active farmer.
- INHFA are calling on DAFM to ensure that Active Farmer status and Agricultural Area are protected where rewetting is prescribed within any voluntary or national scheme.
- What guarantees can you provide on the future land eligibility of farmland that responds to policy change e.g. rewetting of farmland?

The solution INHFA proposes to prevent this unequal treatment of farmers in these scenarios is for the DAFM to allow a default position where the provision of a public good is the deciding activity that confers active farmer status in these cases as per Article 4 [a]. Farmers need iron-clad assurances on active farmer and eligible hectares status.

Conditionality - GAEC's

In the INHFA there is a significant concern in relation to GAEC 2. On this, it is vital that DAFM ensure that water table manipulation in the AECM in 2023 is in accord with the standard set for GAEC 2, which is not due to be implemented until 2025. This can ensure that the grazing of livestock is not prevented from 2023. PG ELP is reliant on the continued grazing of livestock to ensure status as an agricultural area.

Pillar I Interventions

Basic Income Support for Sustainability (BISS)

We welcome the proposal to continue with convergence to a minimum of 85% but there is an opportunity to go beyond this and deliver full (100%) convergence in the new CAP Plan. We are advocating that the Minister considers this rather than waiting a further 5 years to implement a fair treatment of all farmers.

Complementary Redistributive Income Support for Sustainability (CRISS)

On the first drafting of our CAP proposals in 2017, we outlined the need for an intervention such as this. While we were seeking a front-loaded payment on the first 15ha from a 10% Pillar I budget, the decision to pay on the first 30ha is acceptable as it introduces the concept of a front-loaded payment.

Complementary Income Support for Young Farmers (CIS-YF)

In supporting the objectives outlined in this scheme to help young farmers who are entering farming, it must be part of a wider strategy of generational renewal. INHFA is calling for the Green Cert to be voluntary. This would ensure equal treatment of farmers.

The Green Cert is discriminatory and not objective. A new entrant to farming can pass the Article 3(1) definition of (farmer) and the Article 4 definition of active farmer including pluri-active farmer without this obstacle.

In the case where the status of farmer and active farmer is achieved through the farmer choosing to exercise the agricultural activity of provision of a public good, that is sufficient evidence of the required skills.

To require a Green Cert, in this case, is discriminatory and will lead to unequal treatment of farmers in the EU.

The education requirement is also discriminatory and non-objective on the basis that there is no training or education available on this provision of public good agricultural activity.

The skills required to deliver the public good agricultural activity chosen by this farmer is the ability to operate a tractor and toppler or engage a contractor to carry out the operation.

The skills audit could be carried out by the farmer's advisor, in line with EU Council recommendation on the validation of non-formal and informal learning 2012/C 398/01, and would consist of evidence that permanent grassland is being maintained which is the provision of a baseline public good.

Many members have cited the irrelevant content of the Green Cert courses for the context of hill farming. There are no one-size-fits all when it comes to farming and modules need to be designed to represent the different models of farming and the optimal methods depending on land type, area, designated land etc.

In making available an alternative option to the Green Cert based on the recognition of skills acquired through a skills audit young farmers should be in a position to avail of the same supports as this would have equal standing to the Green Cert.

In the reassessment of this requirement other options such as acquired knowledge, recognition of prior learning and experience, local knowledge, other third level qualifications and agricultural science qualifications from the Leaving Cert, could also be included and recognised.

A further option would be to consider developing tailored programmes such as a Skillnet programme that would focus on providing education specifically for the Sheep and Beef sector, like the National Organic Training Skillnet that provides flexible, local learning to the organic sector. With such qualifications, farmers should be able to avail of all supports available to young farmers.

National Reserve

There will need to be a national reserve to accommodate specific cases and bring their overall Pillar 1 payment up to the national average. In total there are four specific categories that will need to be accommodated.

- Young farmers that are currently below the National Pillar I average.
- New entrants currently over 40 that have started farming in the previous two years
- The Forgotten Farmer Group
- Farmers that had land made ineligible and lost entitlements to the National Reserve where that land has since been made eligible and meets the definition of an eligible hectare.

For these farmers to qualify they will need a Green Cert or preferably its equivalence as we have outlined in our proposal under the CIS-YF.

Eco-schemes

As this scheme will require major demands from farmers it is vital that an adequate budget is available to ensure farmers are properly remunerated. The current budget proposal of 25% will deliver a uniform payment of €63/ha which is the minimum requirement for the demands expected from farmers.

Regarding the specific measures, we welcome the announcement of the additional measures and flexibility on the existing measures. This flexibility especially on *the space for nature and the planting of native trees* are vital additions.

With regard to Natura lands The INHFA will not accept Natura Lands being included in the calculation for the Space for Nature measure as this measure only caters for non-productive features and areas.

The INHFA are calling for a standalone Natura 2000 Eco Scheme measure that gives equal status to the legal designation and productive agricultural land in the delivery of a public good.

We are also calling for furze (whins) and rock out-crop which are significant habitat areas, supporting a wide range of biodiversity be used in calculating the threshold percentages under the space for nature measure.

For Organic farmers, we maintain that the holding of an organic licence (with the associated transactional costs) should provide organic farmers with automatic entry-level access to the Eco-scheme. This will not create a double-funding issue.

Sectoral Intervention:

Apiculture

Little attention has been paid in the draft CSP scheme to the importance of bees, particularly when they are under threat and so vital to all humanity. Bee-keeping should be promoted on farms. This could be complimented by the development of species-rich grasslands.

It should also be considered to allow farmers to link with local bee-keepers so that they could work together to promote bee populations by managing grasslands and habitats for the benefit of bees.

Consideration should be given to including bee-keeping as an action under the AECM and/or promoting the management of habitats for bees as part of the eco-scheme.

Pillar II Interventions

Area of Natural Constraint (ANC):

In the draft CSP, DAFM sets out the standard output of the various categories, clearly, there is a massive impact on output due to natural constraints. However, what is not transparent in this presentation is how the top-up allocated to ANC is calculated and weighted. This information would be very useful to farmers and their representatives if these calculations were published so that we can all assess the fairness of such allocations.

Can DAFM clarify if there is a risk to farmers' incomes in the following situation:

Where rewetting of land is deemed to be an artificially created constraint by European court of Auditors deeming the land no longer eligible for support under areas of Natural Constraints scheme.

The natural biophysical constraint that characterises and qualifies much of the ANC of Ireland is excess soil moisture. If farmers are directed to rewet/manipulate the water table on foot of policy re-direction, is there a risk that this would over-write the qualifying condition for ANC? And that farmers may therefore no longer qualify under ANC? If this is the case this needs to be communicated to all farmers before any scheme would be undertaken that would have a rewetting measure built-in.

Agri-Environment Climate Measure (AECM)

Whilst the INHFA welcomes the objectives of the proposed AECM scheme, we have many serious concerns in relation to the AECM programme. Primarily, the inadequate budget, the inadequate participation targets and the lack of details on the results-based elements to the programme.

The estimated unit costs for the proposed actions do not send a clear enough signal that DAFM is serious in promoting environmental protection, enhancing biodiversity or promoting sustainable development. Indeed, it suggests that DAFM remain wedded to a productionist model of agriculture and fails to value the real benefits of Ireland's existing good environmental stock. The payments for significant interventions on the farm and landscape do not reflect a commitment to rewarding good environmental stewardship appropriately. It is difficult to assess how unit costs and figures were arrived at as that information has not been provided with the document. However, alongside the under-estimation of real costs of actions there is no indication in this document that the many skills of farmers and their actual labour input is fairly recognised in this proposal. It is likely that many of the proposed interventions will add to the financial burden of land management rather than support incomes.

Notwithstanding the above, many farmers exist on very low-income relative to the work and management input and depend on the agri-environment measures. The current targets of 30,000 participants in AECM General (Stream A) and 20,000 in AECM Co-operation (Stream B) are insufficient.

The INHFA proposes that the scheme is extended to allow access for 70,000 farmers.

A further area of concern is the lack of detail regarding how the AECM Co-operation will operate or to what degree stakeholders will be involved in the design of these programmes. It is very difficult to achieve consistency of approach across individual teams/projects, a fact that was discussed in relation to current EIPs that these Co-operation Project (CPs) appear to be modelled on. The INHFA are very concerned that farmers would be at the mercy of untried entities who could have far-reaching consequences for their farms and livelihoods.

Specific Areas of Concern AECM (General & Co-operation)

The INHFA require that the mapping for the 8 stream B areas in the AECM are made available before we can give our assessment of the overall AECM scheme.

The INHFA asks DAFM to revisit the unit costs and update these in line with current cost estimates and review the value of the farmers input to a fair level.

To encourage enhanced farmer engagement in agri-environment management, including farm plan development, the AECM design should allow for farmers who are willing to do so to design and submit their own plan without the services of an agricultural planner. This would allow farmers to be more immersed in the thinking and rationale for their own actions rather than a planner. To this end, the paperwork/online aspect of the scheme should be simplified. There should be opportunities for farmers to conduct some compliance through self-assessment processes.

Access:

Given the tiered structure of AECM General, there does not appear to be adequate provision for farmers in lowlands that are neither in Natura or organic farmers. There is a risk that a lowland extensive farmer on peat soils may also be excluded from Tier 2 as planting trees may not be an option. Therefore, with the limited number of places available in the scheme as currently envisaged many farmers may be excluded.

We propose that numbers accessing the AECM General and AECM Co-operation should be increased to allow greater opportunity for involvement.

It is vital that DAFM clarify what is the ranking and selection process for farmers to participate in the AECM (General & Co-operation)

AECM - Co-operation:

Using a results-based scorecard (on such a large scale) on extensive commonage lands is unworkable and risks farmer's income from an Agri-Environmental Scheme. This collective approach also risks the potential for farmers to access the scheme as individuals.

On any results based scorecard it is vital that agricultural area is on equal status with the habitat.

The INHFA has grave concerns as regards the potential way this new scheme will work especially on a large scale basis. It points to issues from existing EIP schemes and the cost-benefit analysis that they achieved.

It is crucial farmers be allowed maintain established local practices in the stream B co-operation approach where those practices are essential to retain the Agricultural Area

status of those lands. This can be best achieved by using the min/max figures assigned to those areas.

It is vital that all rules and activities within the new AECM Schemes be covered under the Farmers' Charter of Rights with farmers also having recourse to the Agricultural Appeals Office

All oversight committees of the 8 geographical regions must have a representative from the INHFA.

The INHFA is very concerned about the lack of any detail or clarity on how the AECM co-operation teams will be implemented. Yet farmers within the identified Co-operation Project (CP) team areas will have no other alternative as the AECM General will not be available to them. This potentially places farmers in a very difficult position with much future uncertainty. The Co-operation Teams will define the biodiversity, water and climate priorities in each of their regions and set objectives to address these areas. The CP will also develop action plans for biodiversity, maintenance of good water quality, safeguarding of carbon stores in peatlands, semi-natural pastures and semi-natural woodlands. The draft CSP mentions the full and meaningful involvement of state agencies – NPWS, EPA, LAWPRO, ASSAP as well as environmental NGOs; which the document states will be key to ensuring targeting of measures is appropriate, effective and uses the correct resources. However, there is no mention here of the farmer who is the key stakeholder and has the most skin in the game.

Farmers' knowledge and understanding of local land-use is unmatched and their involvement and leadership will be essential to the success or failure of AECM Co-operation. It is imperative that all stakeholders especially our farmers are involved in the discussion and design of the CPs remit and actions. As part of this, the local knowledge of farmers will be essential to the smart design of initiatives from the outset.

Role of Co-operation Teams:

In the draft CSP document, Pg 397 – the last sentence of the last paragraph states:

'It will allow for co-operation of other agencies to augment the impact of necessary responses, and to ensure that expertise is applied in a full and rounded manner.'

Can DAFM provide more clarity on this?

Low Input Peat Grassland:

In relation to the action of protecting low input peat grassland, potentially involving a direction to re-wet/manipulation of the water table on that plot. There appears to be little recognition given to the irreversible nature of such interventions and the impact on current farming practices. The unit cost allocated compares similarly to other actions that do not have such far-reaching consequences and in no way recognises the commitment the farmer is expected to make to this measure. The INHFA asks the DAFM to look again at the placement of such measures in short-rotation 5 yearly schemes. If you are going to ask a farmer to commit to such a drastic intervention, then there must be a much longer and improved support scheme such as exists in forestry.

Commonage:

Article 65 (4)

The acquired husbandry practices that result in the establishment of hefted instinct in herds and flocks on unenclosed commonage. This could be utilised as an entry-level at stream A and be reimbursed as a transactional cost linked to husbandry management decision and enforcement costs of prescribed stocking limits. Hefting as a practice is associated with more environmental benign grazing patterns with adapted seasonal selective grazing by sheep.

This gives flexibility to all of the grazing measure to stream B and reimburse as additional costs incurred income foregone.

The lowland flocks would be protected in the same way as previous CAP programmes.

Can the Department clarify if the only feasible action on a commonage from a legal perspective is targeted grazing of carbon-rich ecosystems using min /max figures?

Would any other action put the farmers in conflict with Article 39 of EU regulation "Verification of eligibility conditions" which states " Where an area is used in common, the competent authority shall allocate it between the individual beneficiaries in proportion to their use of it"?

On the issue of cross-compliance flexibilities on commonage causing disruption to payments when management is co-opted to contractors outside DAFM, the solution INHFA proposes is that to protect stable flocks the main measure in stream B should be to use min /max grazing measure. This is one of the few measures that can operate on a management basis in a commonage situation, particularly as not all farmers in the commonage may opt to join the AECM.

Birds:

The INHFA are concerned how some the results-based actions in relation to migratory birds will be dealt with. An Irish farmer may comply faithfully with the prescribed action but quite literally actions that occur in an external jurisdiction may adversely affect the population and therefore result of the Irish farmer. ***How do you propose to mediate this?***

Concerns have been raised in relation to the proposed action on ryegrass seed sowing, problems have been reported from other EIPs that such an action only attracted extra crows and increased the menace of such scavengers on sheep farms. A proposed solution would be to recommend the sowing of native pollinators instead under this action.

AECM – Training

There is a need for better designed and tailored training programmes for farmers. In previous schemes, training was interpreted as box-ticking exercises with short-packed courses to satisfy the requirements of the scheme. What is set out currently in the CSP will result in the same approach to training. We recommend a more comprehensive programme where specific elements of the AECM scheme are delivered on a farm(s) over a series of

engagements so that one feature or element of the scheme can be dealt with in each session and give the opportunity for genuine training and education.

The INHFA asks that DAFM reviews the disparity between what the farmer receives for participation versus the allowance to the trainer. It seems another example of a prejudice towards farmers as a professional group. Indeed, throughout the CSP there is recognition of the need to properly remunerate the 'professionals' (e.g. AECM training and the budget allocation for CP entities) but no such professional courtesy is evidenced towards the farmer.

On-Farm Capital Investment Scheme (OFCIS): Pages 421-431.

Virtual Fencing:

This we maintain should be included for support under this scheme as it meets the special objective of contributing to Climate Change mitigation and adaptation. The use of Virtual Fencing is not intrusive to habitats or designated lands but is critical for the management of their suckler herd which is a vital component in protecting these habitats.

Sheep fencing:

This will need to be included with due consideration given to the increased cost of fencing posts. This will require a unit price increase from the current rate. For farmers on Natura land that requires planning or an exemption from planning, we need additional funding to be available to cover all of the additional ad-min costs e.g. Planning and Natura Impact Statements.

Drones:

These should be included for grant aid as they have become a management tool in steep terrain and hill farms in locating flocks of sheep and could be classed as a precision farming tool/equipment. They are also vital from a health and safety point of view as regards farmers getting hurt or possibly getting fatally injured.

Increased Costs

Increased Grant rate under this Scheme to 50% and 65% to reflect the increased costs that have been added to cost of steel, timber, cladding and concrete as well as labour. Also increased costings to meeting new environmental and climate change ambitions.

Maintenance of Old Building & Structures:

Maintenance of Old Buildings and farmyard walls should be included in OFCIS funding as they are an integral part of the farming system. This can be positive as it is using an existing structure to help in farm management and should also be viewed as part of the circular bio-economy and positive in Climate mitigation as the farmer is using the embodied energy of an existing structure.

Farm Safety Course:

This could form part of the On-Farm Capital Investment Scheme or could operate independently. To be made available to all farmers where they receive €1000 for attendance at 3 Lectures and 1 on-site module. The module should be enterprise-specific; farmers can apply for which one best supports their farming practice.

Young farmers and Women Farmers (pg. 426-428)

The top-up for Women Farmers in a Capital Investment Scheme – 60% OFCIS for Women. The qualifying criteria makes the scheme much less favourable and indicates it will not achieve its objectives of providing due recognition to women in farming and encouraging new women entrants into farming, promoting gender equality.

Firstly, the discriminatory age bracket of 40 – 55 years makes the scheme unviable for a vast majority of female farmers, particularly when you consider the average age of a female farmer in Ireland is 62 years, five years older than their male counterparts (DAFM, 2018). In its current format, the scheme excludes the majority of female farmers. The age limit of the scheme should be increased to the retirement age which is currently 67 if it to achieve its objectives.

Also, the qualifying requirement for appropriate training/skills i.e. the Level 6 Green Cert is another issue of particular concern to women, in addition to the comments made in relation to young farmers. Due to the lack of places available on green cert courses and the opportunity costs in terms of time associated with completing a course, means it is not possible for a lot of female farmers who are working, farming, child-rearing responsibilities (primarily the responsibility of the woman). **For this, we are proposing that women who have been head of a farm holding for at least three years are exempt from having to complete the Green Cert and will automatically qualify for the OFCIS 60% grant.**

Organic Farming Scheme

The increase in support for organic farming is commendable, however, unless changes are made to the payment structure and who can access the scheme then the targets for participation will never be realised.

In the current organic scheme for farmers to receive the maximum payment they must deliver a stocking rate of 0.5/LU/ha. Reduced payments are made to farmers with lower stocking rates. This discriminates against farmers on designated Natura lands and other lands governed by mandatory grazing restrictions or land operating under natural constraints. Given the realisation, that we need to fundamentally alter our production pathway and the reliance on imported livestock feedstuffs as part of reducing our carbon emissions then this stocking rate must be modified. We need the DAFM to utilise the flexibilities allowed by the EU in the regulations to pay any farmer with these lands the full organic rate.

With regard to certification, we need to discontinue the practice where Irish certification bodies are allowed to offer a hybrid standard and only allow certification to the EU standard. Private standards can be offered to operators who do not receive an EU organic payment. Stricter standards may only be offered where the standard is also the National standard for non-organic products.

Knowledge Transfer pg. 449

The requirement to attend 8 Knowledge Transfer Group meetings per annum over the 3-year period is quite a lot considering the payment rate is €750 per annum. Over the 3-year period a total of 24 meetings for the financial reward of €2250. The opportunity costs of time, travel, annual leave (if employed off-farm) isn't adequately represented or compensated in this figure.

In the current CAP, the Knowledge Transfer Programme operated a very similar pay-scale with €750/year for the farmer and €500 to the Farm Advisor for each farmer. There was and remains a considerable amount of disquiet with farmers on this and for the DAFM to propose the exact same payment scale in the new CAP Programme is unacceptable. At a minimum, the payment rate to farmers needs to be increased to at least €1,000/year and if there are budget constraints around this then the DAFM need to revisit the payment rates available to Farm Advisors.

Barriers to entry such as Bord Bia membership or participation in an Agri Env Scheme (as what happened in the previous KT) should not feature in this scheme.

Suckler Carbon Efficiency Scheme

This scheme in its current format will not deliver for the vast majority of suckler farmers or the sector as a whole. On this basis, we need a radical alteration of the scheme with supports and measures similar in style to the BEEP-S which was built on the commitments made in the Beef Taskforce to prioritise direct support to the suckler sector.

The Suckler Carbon Efficiency Scheme (SCES) is a continuation of the Beef Data & Genomics Programme (BDGP) which had a very low uptake with small scale suckler farmers and due to its many flaws saw a high number of farmers leave the scheme during its lifetime.

In assessing the proposed SCES there are several issues that are of major concern:

- The 4 and 5-star percentage requirement for replacement of the sire and dam is at a level that is unachievable, especially for new entrants to the scheme.
- In relation to genotyping, many farmers that invested in cows that are suitable for grazing on extensive hill systems and imported similar type cattle from the UK are left with no star rating on the ICBF mechanism. These farmers who are delivering an important environmental benefit will be excluded from joining the scheme.
- Regarding the requirement to participate in a Bord Bia quality assurance scheme, many small scale suckler farmers sell their weanlings and stores in local marts and are not members of Bord Bia and will be unable to join. We note that this requirement was already removed for the Sheep Improvement Scheme and we would like the same to apply here.

- Regarding the star ratings these were, we understand introduced for the genomics scheme only as a guide and we have not yet seen any scientific basis for the merit of their use.
- In the event that the scheme could be adopted and these concerns addressed the budget will only accommodate 400,000 cows and 20,000 farmers. There are 940,000 cows and 52,000 suckler farmers. On this basis, the budget is short by at least €60m/year.

The issues raised needs to be addressed and equal access must be available to all farmers. With specific measures in this scheme being brought across from BEEP-S. There is an opportunity to look again and develop a scheme along the lines of BEEP-S which had a significant uptake at farm level.

On Pg. 230 of the draft CSP the DAFM refer to the simplicity of design of intervention. Unfortunately, this is not present in the proposed scheme. However, a BEEP-S type scheme with an overall annual budget of €150m could deliver important support to the sector while addressing welfare and environmental issues and delivering on the objective of simplicity.

All the measures in BEEP-S would still be relevant with the option of additional measures. One such measure could be to encourage extended grazing to combat AMR. This measure is recommended by the EU Commission and could be implemented by a declaration by farmer to extend by a set amount of days the grazing season based on historical reference which is available already to DAFM and Bord Bia.

Sheep Improvement Scheme

We welcome the fact that there will be a scheme to support sheep farmers from the inception of the new CAP Programme unlike what happened in the current CAP Programme. However, the proposed payment of €12/ewe is well short of where it should be. In addition to this, the €12/ewe payment is conditional on no more than 1.7m ewes joining the scheme.

We need the Minister and DAFM to look again at the overall budget and proposed payment rate. An additional €25m/year in the budget is required to deliver a payment of €20/ewe.

With regard to the proposed options, we are recommending that shearing and dipping be included. There is a real concern with a very bad wool price that some sheep may not be sheared and on the dipping, we are concerned that current alternatives used by farmers are not as effective as they need to be.

On the proposal to genotype, we recommend that this be voluntary rather than mandatory.

A farmer can genotype their existing stock ram and use him to satisfy the genotype measure.

On eligibility, a rolling reference year to reflect farmers flock size should be included.

Generational Renewal

It is important that we look outside the box in having a stream of new entrants coming on board into farming. It is also important that we recognise the value of the accumulated knowledge, often inter-generational that an experienced farmer brings to their farm. It would be a win-win if the farmer and the knowledge they possess is harnessed and passed on to the next generation.

We propose that an apprenticeship course be created called “**the Experienced Farmer Fund**” (or Generational Renewal Fund). When the farmer reaches the age of 55 they could be paid a wage to transfer their knowledge to a young farmer which would deliver the acquired knowledge to the next generation. They would then be in a learning environment that is relevant to what they need to know rather than educated in a sector that they may have no interest in. The participating young farmer is also paid an income. This is an innovative way to allow young farmers to apprentice in practice whilst targeting their farming enterprise rather than having to learn about a sector they have no interest in.