



Draft Cap Strategic Plan Environmental Consultation  
Department of Agriculture Food & Marine  
Agriculture House  
Kildare Street  
Dublin  
DO2 WK12

Date 08 - 12- 2021

Dear Sirs

The following is the commentary and views of Leitrim IFA (Irish Farmers Association) to the the Draft CAP Strategic Plan 2023-2027

Where we submitted a proposal under the original consultation we are now making requests to your office for reviews under the following headings and additional clarity on amendments proposed.

1. Convergence of the BISS at 85% proposed

This does not go far enough we want 100 % as the graduation of the 25% over 4 installments at 6.25% per annum is too slow, as we are coming from a low base of 60% and whilst the 25% further convergence is welcome it should be paid in year one.

If it takes 4 years to deliver the further 25% convergence and the residual 15% to full convergence will take us to 2030 so if we take the current proposals as a yardstick then half a generation will have passed before parity and equalization of payments is achieved, this is not good enough.

2. Front Loading of 10% proposed under CRISS is welcome, we sought €14,000.00 base payment for 40ha., as a combination of the Convergence and Front Loading this is €350.00/ha. Under the current proposals Convergence and Front Loading within the current national average entitlement upon which the future payments are based is €145.00 for BISS plus €65.00/ha of ECO payment plus €33.00/ha of the CRISS payment over 40ha gives a total base payment for a farmer seeking upward convergence of €243.00/ha approx. We sought €350.00/ha as a base for all farmers without distinction

3. With reference to Agricultural Area defined on Page 17 within the summary of the draft strategic plan to include “rushes” within the “permanent grassland “definition “ This is welcome , however we would also suggest that the harvesting and saving/baling of rush is considered a **crop** for feed roughage, bedding and compost as it has a low fertiliser nutrient requirement and would meet specific goals where mitigation of nutrient run off to water courses can be minimised and is suitable to heavy drumlin soils. The harvesting of the rush should be further considered as a farming activity equal to tillage sheep and cattle farming.

Reclassification of the rush as a crop would reduce the carbon footprint hauling straw around the countryside as the alternative roughage, bedding and compost product.

4. “Young Farmer” definition on Page 17 of Document. We fully agree with this review.

We require the following amendments:

a. There should be no off farm income limit

b. As many young farmers, new entrant farmers, old young farmers whom are in their late 30s and had no access to the National Reserve for entitlements and did not get Installation aid should now be admitted to the scheme as most of these farmers bought their entitlements and should now be entitled to top up those entitlements from the

National Reserve and get entitlements for their naked land from the National Reserve.

c. We refer to Page 22 Eligibility Conditions for the Complementary Income Support for Young Farmers. The 5 years rule for eligibility rules out farmers mid to late 30s once again. A group of farmers whom started farming from year 2001 onward whom would be say 18 years of age would still only be 40 years of age in 2023 so why leave these farmers in the lurch with no access to entitlements once again. We will call these farmers “new old farmers”.

This 5 year rule should be removed entirely and leave the condition under 40 years of age as the only age criterium or hurdle to be jumped

d. Once again it appears that anyone under 40 years of age with no historical link to farming can do the Green Cert, lease land, harvest 50 ha of entitlements on rented or leased land and disenfranchise the “real farmer” who meets the definition of a farmer. The “real farmer” who farmed for 5 -10 years, had an active flock/herd number, bought their entitlements or had no entitlements. These farmers meet the test of a farmer that are entitled to have priority access to the National Reserve and are not Entitlement Raiders which the thrust of the Complimentary Income Support for Young Farmers the current proposals seem to cater for. In that all farmers are coughing up 6% to the Young Farmers Top Up and the National Reserve and are not all at same level of entitlement Value as is under the scheme they are deducted to support coupled with ease of access of Entitlement Raiders is a slap in the face to the mainstream active farmer. It appears now that you harvest entitlements first and decide to farm afterward which is the thrust of the current proposals and this loophole should be closed to read farm for 5 years and then apply for entitlements this way will sort the chaff from the oats.

5. Eco Schemes as outlined on page 23 of Summary of the Draft CAP Strategic Plan 2023-2027 is acceptable and achievable by farmers in Leitrim. The doubling up of the Space for Nature to 14% can act as a 2 in 1 compliance measure and is acceptable.

It is our understanding from reading Page 17 that 30% of a parcel of land or lands in a farmers charge with features that may be beneficial to water protection, climate and biodiversity can benefit from the eco payment element at circa €64.00/ha of the proposed eco scheme.

We require the following clarifications


a. That these lands which could be added to the farmers existing entitled lands and constitute 30% of the overall declaration at 70% land with entitlements plus 30% without entitlements (lands meeting the water protection, climate and biodiversity guidelines) and heretofore red lined lands excluding rock/road deducted from a farmers parcels over the years.

- b. That traditional woodland be included for the eco payment of €64.00/ha
- c. That private forest land planted under the Operational Forestry Programme 1989-1993 which did not qualify for support under the 1992 Mc Sharry CAP reforms
- d. Forest & woodlands with species provenance not suitable for commercial harvesting but suitable for biodiversity purposes.

6. We do not think the ewe welfare payment under the Pillar 2 at €12.00 is sufficient in recognition of the eco characteristics of the ewe in foraging our hill landscapes, the geo instincts of the ewe on the commonage is now relegated and forgotten in the current draft proposals. We would suggest that the Ewe welfare payment is increased to €17.00/ewe otherwise we will have to get innovative to support snipe and wild geese as they will be the only grazers foragers left on the hill so please reconsider this request.

We wish to express our thanks to the DAFM & the Minister for the opening up of the consultation process and the representation of the view of our farmer representative bodies and again urge you to review the varies elements of the schemes as outlined above to be more farmer friendly and to be more focused to the actual realities on the ground.

Yours Sincerely

  
for and on behalf of County Leitrim IFA Executive