

CAP consultation document

Submission by [REDACTED] *TD*

In considering the future framework of the Common Agricultural Policy moving forward, I agree that the new CAP strategic plan needs to be tailored objectives for Irish farmers. However, farmers need to be paid adequately and fairly for the measures they are carrying out – particularly for measures which will benefit our national environmental objectives.

Given that the ‘Green Architecture’ of this CAP will be to the fore, it is imperative that the schemes derived for environmental and biodiversity benefits are practical and that high value payments are attainable for small family farms.

Regarding the pilot REAP scheme, concerns have been raised with me that it is proving difficult for some farms to score well when it comes to the species indicator list. As a result, the value of the scheme is being diminished, as agri advisors still have to be paid. I believe this could deter farmers from participating in the future.

Furthermore, clarity is required around the Statutory Management Requirements and standards for the maintenance of land in Good Agricultural and Environmental Condition (GAECs) – particularly GAEC 2 – and what implications this will have for farmers who are farming peaty type soils along the western seaboard. Farmers in these areas must be allowed to continue farming these soils.

Direct Payments

As I have publicly stated many times, a cap of €50,000 needs to be introduced across the board for all farm payments. This equates to approximately €1,000 per week. I believe that capping direct payments at €100,000 does not go far enough.

As well as this, I agree that convergence of payments needs to reach 100% by 2026. The proposed introduction of the new Complimentary Redistributive Income Support for Sustainability (CRISS) is a move in the right direction and the proposed 10% redistribution is a positive starting point.

But farmers with a payment of under €10,000 must be protected from cuts at all costs.

I have continuously indicated that average sized family farms, those of a size of approximately 32ha or less, need to be prioritised under the new CAP in order to make farming in rural Ireland a more prosperous option for young people considering taking over the family farm.

Meanwhile, a young farmer availing of their direct payments, young farmer benefits, an Eco-scheme, as well as an animal welfare scheme need to be able to avail of close to €20,000 per year.

Pillar I

As part of the consultation document, I feel it is important that the definition of an active farmer is cemented in place so that direct payments and scheme payments go directly to those who are carrying out the work – rather than the so-called arm chair farmers. There must not be any room for obscurity in this.

I am glad that additional funding is being fenced off for young farmers, but considerations also need to be given to the 'Forgotten Farmers'. These are a group which were left behind in the previous round of CAP and we cannot continue to ignore them.

In relation to Conditionality and the GAECs, clarity is needed on the impacts these will have on farmers and how it will be different to cross compliance requirements in the current CAP before the Strategic Plan is agreed upon.

In terms of inspections, a yellow card system needs to be followed. If a farmer is notified of an upcoming inspection and they require additional time to carry out necessary works around the farm then they can opt to receive a yellow card without any penalty. This would mean that they could rearrange the inspection for an alternative date within three months of the initial date.

A farmer could only avail of the yellow card system once every two years.

The structure of the Basic Income Support for Sustainability (BISS) and the Complementary Income Support for Young Farmers (CIS-YF) is acceptable in its current format.

Young farmer, can get the entitlements should be curtailed. On lands you are farming.

As previously stated, farmers must be adequately compensated for measures they undertake as part of an Eco-Scheme and it must be inclusive of all farmers.

I am not in favour of a cut to the national herd, but have in the past called for a maximum stocking rate of 2LU per ha.

Pillar II

The retention of the ANC scheme is welcomed and the minimum stocking rate of 0.15 LU per ha should be extended to the 12 month period.

Efforts made to recognise and assist Producer organisations for both beef and sheep farmers should also be followed, which would improve farmers' position in the supply chain.

Suckler Carbon Efficiency Programme

With regards to the above scheme, I do not believe it is right that there should be a condition that farmers would not be able to increase suckler cow numbers during the course of the contract.

If you look at the current Sheep Welfare Scheme, farmers get paid on eligible animals owned based on a reference year. But they can increase their numbers freely without any impact on their payment under the scheme. I believe a similar set up should be introduced as part of the suckler scheme.

The current measures including weighing calves, genotyping etc are acceptable.

As part of the scheme, I also believe there should be an additional payment if a cow is being used to rear another calf in addition to her own biological calf. The additional calf can originate from the dairy herd, but its sire must be of a beef breed ie Angus, Hereford, Belgium Blue etc. As well as this, I believe that calves out of Jersey type cows should not be included – as they do not have acceptable beef traits.

To improve upon traceability, I also believe that we need to incorporate a DNA system for both cattle and sheep over the life of the next CAP to ensure our produce is 100% traceable. This could be carried out as part of a tagging process at birth, given that there are already plans at foot to change the tagging system for bovines.

Dairy Beef Welfare Scheme

As part of this scheme, research must be carried out to identify the best beef breed sires to use on the dairy herd to ensure that the male off spring is a viable option for cattle rearing farmers.

However, we cannot persist with dams of particular breeds which produce sub-standard male off spring – despite the results they may be producing when it comes to milk yield etc.

Sheep Improvement Scheme

The continuation of the Sheep Welfare Scheme is a step in the right direction as it has boar results in recent years.

I believe a cap of 150 ewes should be introduced to the scheme and that the payment per eligible ewe be increased to €25, an increase of €10 compared to its current rate.

On-Farm Capital Investment Scheme

Replacing TAMS II, this scheme should continue to offer the higher rate to young farmers who are playing an active role in the management of the farm.

However, I am also calling for Agricultural Contractors to be included under the scheme when it comes to grant aid for LESS slurry spreading equipment. Most slurry on Irish farms is spread by agricultural contractors, so it makes sense that they should be incorporated under this particular measure.

Young farmers and Generational Renewal

An early retirement scheme must be examined in order to encourage generational renewal on Irish farms. This would give the older farmer some security while at the same time giving the younger generation a chance to take the reins.

This could also have benefits when it comes to farm safety, with less older farmers having to farm alone or deal with machinery or livestock on a regular basis.

Organics / Tillage

Regarding organic farming it must be opened up to all sectors if farming and we must find away to increase the number of farmers in the scheme to between 10 and 15% of all farmers in Ireland in the coming years.

The tillage sector must be supported by livestock farmers in Ireland. It is imperative that tillage farmers grow the required protein crops in order to sell on to the feed companies for the livestock industry – rather than depending on imported raw materials.

Regarding livestock farmers in general, I fully believe that they must be able to provide receipts from registered agricultural contractors for machinery work which they didn't carry out themselves.

I look forward to seeing the progression of our CAP strategic plan in the coming months.