

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Answer to [REDACTED] letter to me
Date: Friday 6 August 2021 18:16:25

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Dear [REDACTED]

Thank you for your absolutely to-the-point letter asking me for input to an initial public consultation on the next CAP strategic plan – you may well regret it!

The negatives

[REDACTED], we have been aware for many years of the need for climate and environmental action'. I find this very difficult to take – a [REDACTED], so-called originally (I imagine) for its concern about the environment, earth, air and water – a little deeper and thinking of soil, atmosphere, rivers and the sea, and all that lives or dies therein. A party like this with two semi-state 'bodies' and going hell for leather to cover the hillsides and lovely so-far unspoilt valleys with vast turbines, and, now, in the bogs they were to be re-wetting!

And then the appalling nonsense of 70% of our electricity generated by renewable energy (wind so far) by 2030 which will destroy the country side and play into the economic aims of Coillte (1000 MW) from wind and Bord na Mona (planting turbines where the plan was rewetting of their ruined peat bogs).

I'm afraid nothing will help our rivers and many inland bays and river mouths with farmland running to the edge of many rivers and bays along the coast. We know the results of run-off from slurry and fertilizer applications both above and below ground and see the results in almost all rivers and many beaches. Too many cattle so too much slurry and far too much fertilizer. Distances from river banks and shorelines would need to be far greater – maybe even no cattle in these vulnerable places?

So far these enormous payments to very few, and enormous, already rich 'farming companies' appal me. So I'd need to know a lot more how these payments will be decided and made. How are these decisions to be made?

Now for the positive

But I do agree that we desperately need a deep shift in agricultural aims, practice and production; yes it is positive from the point of view of the environment and, in time, can be positive for younger generations of farmers and foresters (I certainly hope so) but it's getting from here to there that is the expensive and threatening bridge to cross.

I did my [REDACTED], in nitrous oxide emissions from grazed grassland and I would most certainly agree that a deep shift is required. Basically unless cattle numbers are very significantly reduced (both dairy and beef sectors) we will not succeed in cutting agricultural CO₂e emissions from farming. Organic farming, if genuine, does do both those things – reduction of slurry and fertilizers.

I like your approach to all the challenging changes you are aiming to make: direct and incentive payments with environmental concerns at the heart – payment on results! (But difficult to check/enforce?).

So far these enormous payments to very few, and enormous, already rich 'farming companies' appal me. So I'd need to know a lot more how these payments will be decided and made.

I like your admission that the plan is not perfect but hopefully setting you on the right path and I

thoroughly approve of caring for the environment as key; but this must surely include the huge proportion of our land in semi-state Coillte and Bord na Mona lands where they take it for granted they can make the decisions (and when they are responsible for expensive mistakes we, the population, will pay e.g. the Derrybrian disaster in Galway in 2003 – for which I'm pretty sure we are still paying 15,000 per day (after finally paying off the last half of the 5 million basic fine last summer) for lack of a reasonable EIA).

RE Food-Vision 2030.

To start with I am always suspicious when I hear or read the words 'Ireland will become a world leader' since the completely disastrous Citizens' Assembly (2016) where we were to be World Leaders in renewable energy and achieving a 70% zero carbon emissions by 2030 – we are certainly among the worst in Europe!

The trouble is getting a plan/policy into a working system has to bring the people most concerned by it into a genuine belief that steps they are asked to take can possibly improve either their profits or their lifestyles.

Around here, in [REDACTED], I have watched a vast increase in cow numbers and enormous farm machinery involved in both slurry spreading and later silage in the dairy farms and equally frequent vast machinery involved in the barley and wheat cycle. Many of these farms have clearly borrowed huge money to buy tractors and other equipment although many – most probably – do use contractors for most large scale operations. What about all these debts incurred over the last few years to keep up with advice, increase cattle numbers, produce more milk?

I have a [REDACTED], who arrived in my house one morning furiously angry and quite 'lost' in understanding how he could have farmed all his life following the regulations from Teagasc and improving his land, clearing what he thought of as 'scrub' keeping hedges tidy. He felt what the [REDACTED] was saying was negating his life, making it worthless. He is a bit better now, at least on the surface.

So I thoroughly agree that we need a future for farming in Ireland in which incomes are up and emissions are down. We believe such a clean, green, profitable future is possible. It is achievable. And the [REDACTED] is proud of the part it is playing in making it a reality.

Regards and good wishes,

[REDACTED]

Personal findings on Irish Wool and where there is room for improvement by [REDACTED]

[REDACTED] So my background has retail and wholesale which perhaps makes me more open minded than other sheep farmers. I also have an appreciation for art and crafts and have an understanding how difficult that market is. A few years ago I went with south east women in farming to the Royal Welsh Show before arriving at the show one key ring caught my attention in a service station a felted sheep on a key ring with the Welsh wool board tag. First question to myself is why do I not see this at home. Anyone reading should ask themselves the same question. The sheep sector of the show was very connected to the potential wool industry at the show and also the craft side again ask yourself the question why do we not see the same here. Project baa ba is probably the first such project. The national sheep breeders association is starting to but has a long way to go. The National Show Association is very interested in pushing but needs help. On my return home I looked at various ways of washing wool and tried to find who was doing what. Ask Teagasc they know nothing. Eventually I find people but all disconnected so I set up the Irish Wool discussion group on fb and not one for blowing my trumpet it's probably the only group that has managed in a small way to connect with both farmers and crafters and potential industrial aspects. However I find it extremely hard to get very far because any group like landscapes associations organic trust etc. all prefer if the push was coming from a recognised marketing group. I also find myself explaining the wool process to fellow farmers and explain where the high cost is the majority of farmers that shout insulation are not aware of that for wool to be turned into insulation it still has to go through the expensive washing process. Which is 22euro a kg.

The wool process in brief. Shear composting mulching and pelleting can be done at this point - skirt-scour -picker/comb- card – it's at this point wool goes in different directions such as Felting wet or dry- Spinning – stuffing – insulation. The felting industry is so much underestimated.

Wool has about 125 uses.

Research

It appears to the case that wool is not in the Teagasc portfolio.

I have been unable to find out what do Teagasc do with their own wool.

List of areas that Teagasc could research into.

Testing wool for flock health i.e. deficiency etc. This could also be part of animal welfare payments project

Staple length to determine which Irish breeds are good enough for spinning

NPK for help in the slug pelleting and fertiliser and compost research

Use of the above at industrial level e.g. cereal crops

Methods of washing suint v chemical

<http://bluebarnfiber.blogspot.com/2017/07/suint-fermentation.html?m=1> Chemical reactions to slurry if on farm washing was done

Raw Black wool verses Bark Mulch can it compete Landscape associations what to see results

Testing how clean wool after the suint fermentation method

How legal is the Suint fermentation method

Testing wool strength and fire resistant

Different lanolin uses

Testing o farm washing units

Mobile washing units

Could washing wool on farms be part of a diversification project could the equipment be bought under TAMS

Have we Irish manufacturers that would look a producing such equipment e.g. mini mills produced by Belfast mill in Canada www.minimills.net

Could the washed wool market be opened up.

Marketing

From reading the International Wool Standards our Quality Assurance is inline so a connection with Bord Bia is needed.

We have a few mills saying they are using a percentage of Irish wool but no proof. We have one mill taking in raw wool sending it the uk to be scoured by cant guarantee what they send comes back. we have other companies using the term Irish wool when they are clearly not. One way to rectify this is work something similar to bord bia. Except instead of per animal it be per bag for flock. Dispatch DKT accompany bag which could also be tagged to scouring plant I should point out we have one scouring business already started [REDACTED] haven't seen his set up and I did say to him he should patent it.

Inspector of mills should be carried out amount of Irish wool bought and used verses imported wool. A blanket approach should be taken on end product each mill should have a tag on all products stating amount of Irish wool they use. Each mill could be rated depending on the amount of Irish wool used. Something similar could be done for crafters. We currently have about 1500 crafters who want to use Irish Wool but find washed wool hard to access

Please don't be dismissive of the craft sector reason being this is a stepping stone for some for those interested in taking it to industrial level at could also be a diversification project for some on farm. We have about 1500 crafters looking to access washed wool. I have done my best to try and find a lot of

these people and point them in the right direction but once again this need to be done by a marketing body. The Irish guild of weavers spinners and dyers has done a bit but could do more same could be said for felt makers Ireland. I should also point out some of the recent migrants have come from family run wool mills and are involved in the recent growth of spinning.

Areas and events to target Marketing

Souvenir shops service stations supermarkets airports Irish wool should be every where with a one tag says all.

Bloom – bloom is sponsored by Bord Bia we should be looking for gardens to show using wool as a mulch

We need Irish wool at all garden household agriculture fashion RDS events.

Target the Tidy Towns for using wool for lining hanging baskets this can be done using raw wool.

It's also a great way to show case in every town village around the country.

Community garden project

Yarn Bombing currently the country council give approx. 100 euro to each group could be changed to you will only get it if you use a % of Irish wool. Most of the wool used in yarnboming is synthetic they might as well wrap trees with bin liners.

Bio diversity groups again I have been on to groups but cant get anywhere as I am not part of some marketing group.

Organic groups need to up date web pages to include wool as a organic fertiliser and slug pellets

We currently have vitax bring in wool slug Pellets from the uk Larkfield need all the help they can get to compete

Dale farm are trying to bring in wool compost.

New Zealand wool drier ball can be got in Home store and more Supervalu and lidl

Drier balls are an organic bounce sheet they take the static out of clothes

The Wool in Schools project is another project that needs help. Personally I am trying to get this done in the three local schools near me [REDACTED] area. Am hoping to take it a stage further all the work done by the kids could be showcases in our three community cafes

With eco printing and natural dyeing on the up these are two areas that complement wool. Irish Fiber Crafts is a classic example of what can be done. I did a course with [REDACTED] and I have to say it was a very enjoyable experience highly recommend it.

A tourist came to Ireland and wrote an article solely on their inability to find items made from Irish wool.

I am probably the only sheep farmer in the country that thinks wool should stay in category 3 and my reason for that is I am fully aware of cross contamination from working in feed mills. I am also aware of the haulage costs attached to wool so therefore I believe a larger processing plant is NOT the answer.

Vtec course are also another that could help.

Design Council of Ireland could help too. Check out the Wool innovation prize
<https://woolinnovationprize.com/>

Other departments that could help are Arts Culture and Heritage Education

IFA need to have wool used in several ways at the crib they sponsor at the mansion house.

The campaign for wool is headed by the Prince of Wales something similar could be done here [REDACTED]
[REDACTED] comes to mind

Irish Wool probably a greater chance of exporting end product than other countries

All the above is not going to move the vast stock piles of Wool but it's a step in the right direction

Is there anything in the archives from the previous wool board that might help

Where are those archives.

A wool innovation centres exploring present and past.

Innovation centres could be linked in with community projects

Ballygrennan,
Bruff
Co Limerick

14/08/2021

Dear Sir,

Re new CAP scheme.

In the new cap schemes, an individual farmer should be able to apply for any scheme without using a planner. Each farmer could choose from a list of options and be allowed to suggest his own options.

There should be a retirement option for all farmers to exit the single payment eg. a taxfree lump sum equivalent to 3 years of your single payment.

Schemes should be simple eg honey bees, vegetable patch, wild flower patches in field corners, untitled patches in arable fields, animal welfare incentives, retired greyhound sanctuary, donkey sanctuary, donkeys.

Planting a grove of any trees, maintained in an organic fashion, should mean that you get paid for each year the grove is maintained.

We must address the issue of opening up the countryside to all citizens. This is a huge logistical issue with indemnity aspects. There are insurance issues for farmers and the public we allow on to our land. If the incentive was great enough and if the public had their own insurance allowing the farmer to be protected, then progress might be made on the matter.

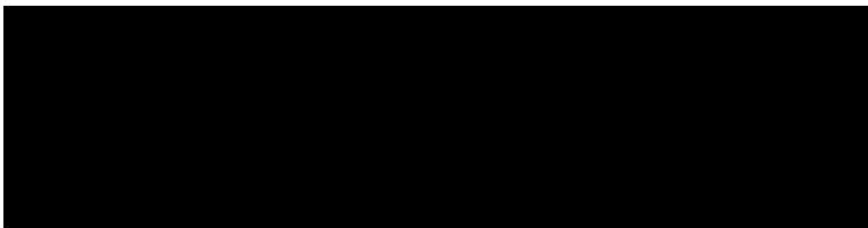
Natural features, eg riverbanks, streams etc should not be fenced with barbed wire; more natural ways of keeping animals out should be employed. Prescribing barbed wire fencing as a way of qualifying for a cap payment does not do much for a green environment.

Hedgerow maintenance especially on public roads should be incentivised both for safety and environmental reasons

If a roadside drain is blocked, a farmer should be incentivised to maintain it.

Farmers should be incentivised to provide nature walks along natural features in their land; payment would be for maintaining and upgrading to certain standards. Obviously admission would be by appointment with control of numbers, all of which can be done electronically.

Providing a rest / dining area along trails should attract further fees.



25-8-2091-

~~Dear~~ CAP- I am a FARMER
D.O.S. C.A.P. Reply to me
and if it does Please
add my name to the
C.A.P. list FOR me Please
if it apply to me
FOR the coming years
if I has got any thing
to do with my FARMING
Please enter my name to
the C.A.P. FARMING list
FOR me BEFORE it is late
FOR me to apply FOR CAP/
OR POST- ME a C.A.P. FOR me
FOR me to Fill FOR C.A.P

Hi folks,

Just some suggestions that may help with the CAP formation.

Questions that need to be addressed.

- a) I feel that Ireland should cap the direct payments at €66,000. This payment is a considerable amount of money to be granted by any member state tax free. Any individual working to earn €66,000 take home pay is more than likely on a salary of more than €100,000. This cap should be imposed on every herd number receiving grant aid. However, I do feel that there needs to be a system brought forward by DAFM to ensure that farmers or companies won't apply for a second herd number or a third herd number in their partners or child's name to avoid the capping of their current entitlement.
- b) Internal convergence should not stop at 85%, it should be 100% by 2026 as this would create a more level playing field among farmers.
- c) With regards to the redistribution of payments I believe that Ireland should go further than the 10% mark, also it should be issued to farmers under 30ha as this would include more farmers particularly in the west of Ireland where the average farm size is considerably smaller than the farmers in the southern and eastern part of the country.
- d) I believe that Ireland should go with the 25% eco scheme rate as this would ensure that every holding is contributing to the environment, regardless of their output. This would also add to the marketing value of Irish products as the products will be able to advertise that they are produced on environmentally friendly farms. I think that this section should be called regenerative farming which requires farmers to carry out an environmental measure to ensure they receive their full payment. There should be maybe three measures to pick from and it is required to carry out one measure for the 25% proportion.

These measures could include something simple like increasing the width of their boundary ditch/ fence. This measure could require that all fencing (electric/wire) around the boundary of their farm be stepped out 1 meter from the boundary ditch this would allow for the growth of more scrub on ditches allowing for more biodiversity. If the holding beside them decided to opt for this option, then it would increase the boundary ditch width by 2m from its current width. This would not only improve the nesting habitats for birds and small animals but also contribute to the biosecurity measures on the farm such as ensuring that there is a good stock proof boundary between holdings.

Another option could be aimed at tillage farmers where there are few fences around boundaries is to allow hedges on boundary or internal ditches to go uncut for a 2-year period on half the farm and for a 2 year period on the other half of the holding. The reason for inclusion on internal ditches here is that this the boundary is adjoining a roadside It may not be possible to allow the hedge to grow taller or wider on the roadside. Allowing the hedges to go uncut for a period of 2 years will allow them to flower throughout the autumn allowing for the hedges or brambles to produce fruit in turn that will increase bird and small animal numbers. The third option could include the introduction of fruit bearing plants into ditches on the farm such as red/black current bushes white/black thorn, holly also native ash

such as (rowan). Some measure like these to acquire the 25% stake of the direct payment should be used as a guide there may be more measure that others could come up with to allow farmers carry out some regenerative farming measures. Over the past while in practical with the dairy expansion ecosystems and the environment have gotten second priority on most farms. Some measure to improve soil health could also be an option.

- e) The current system works well however I do feel there is a practical issue with regards to the so-called armchair farmers. There needs to be considerable consideration given to the definition of an active farmer, which must include the holding of livestock or selling grass as hay/silage. There needs to be thought put into how to prevent farmers putting cattle into a person's name for 9 months to allow that person to draw down their entitlements even though they may never see the animals or visit the holding.
- f) I feel that there is no need to incentivise gender balance in the sector.

Having recently read the new proposed Interventions for CAP, I have some recommendations to make on the proposed schemes.

With regards to the new suckler cow scheme, some suggestions on capping the suckler cow numbers has created a lot of bad press for the Department and the Minister. If you look at the ICBF publications on cow numbers it states that there has been a reduction from 1,046,927 suckler cows in 2011 to 950,963 in 2020 that is a reduction of over 95,000. This in away has already grossly reduced the emissions from the sector. On the other hand, looking at the same publication from ICBF on dairy cow numbers there was 1,144,826 dairy cows in 2011 to 1,570,180 in 2020 which is an additional of over 425,000 cows in the sector. I do feel that there needs to be a change in outlook on the negativity associated with the suckler sector with respect to the emissions. On most suckler farms stocking levels are far less per hectare than on most dairy farms. The use of chemical nitrogen is far less on suckler farms and I do welcome the introduction of the review of nitrogen excretion levels from dairy cows based on their yield. Capping the numbers of suckler cows doesn't seem to be going to be the golden key in reducing our emissions as there won't be a reduction in emissions if there isn't a reduction of numbers in either dairy or suckler cow numbers. However, an alternative option that I feel would help with reducing emissions from both sectors is to promote the reduction of slaughter age in both the suckler breed offspring and the dairy breed offspring a reduction of 4 months on every animal is a massive reduction in the sector overall. I know that this is acknowledged in the new dairy calf to beef scheme.

To ensure that there is continued success in the suckler herd carrying on from the BDGP scheme, I feel that there should be a requirement that the payment is only made on suckler cows that have greater than 55% of their genetic make-up of a beef breed. This will eliminate any dairy bred suckler cows as there is a massive difference in food conversion ratio between animals with the majority of their genetic make-up from a beef breed. This will gainfully improve the national genetic merit of the suckler herd as the majority of breeding cows will be made up of over 55% of a beef breed leading to their offspring having a minimum of > 75% of their genetic merit from a beef breed allowing for that earlier slaughter age and allowing the breeding females as replacements to be of a super genetic merit.

Another item for consideration is to try and have a replacement scheme that farmers receive more of the payment if they breed and keep their own replacements, this will ineffectively help with disease resistance on farms and also help with biosecurity and biocontainment, at present the suggestion is that there will be 4 measures just for example say the payment is at 150 euro per cow 25% for the replacement strategy so a farmer would receive the full 25% if the replacements females are breed on the farm and %15 for an animal if the replacement strategy is to buy in replacements.

The new scheme should be graded in such away that there is a top payment for suckler cows that are > 55% beef genetic merit and also the top payment issued if the replacement strategy is to breed all their own replacement females on farm from 5 star replacement bull be it a stock bull or AI. This will incentivise farmers to breed better beef animals and overall help improve genetic merit of the suckler breed beef. I acknowledge the fact that it could be argued that there will be a reduced market for the dairy beef female offspring to become suckler cows. But the addition of the scheme for the Dairy farmer to use high DBI bulls will help ensure that calves born from the dairy sector will have a strong market value as they are carrying good beef qualities to be slaughtered at an earlier age than the current average slaughter age.

I will highlight the benefit of a graded system so again a farmer would receive the full 25% of the payment if the cow was >55% beef genetic merit and 15% of the payment for an animal with <55% beef genetic merit. This will not be a difficult measure to implement especially now with some many animals in the beef sector genotyped.

To give an example of the difference in payment between a >55% beef animal and <55% beef animal also to show the difference in payment depending on the replacement strategy. For this example, I will use €150 as the top payment per suckler cow.

Farmer	>55% beef €37.5	<55% beef €22.5	Breed Rep €37.5	Buy Rep €22.5	Dung sample €37.5	Weighing Data €37.5
A	X		X		X	X
B		X		x	x	x

Payment for farmer A per cow is the full €150

Payment for farmer B per cow is €120

I know that there are two additional options such as forage analysis and faecal egg testing this I feel would be very beneficial to farmers as it would help with animal nutrition and also help reduce the use of medicines that may not be required for dosing.

I hope that some of these suggestions help you and your team in making decisions on the future of CAP.

Regards

[Redacted Signature]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Draft Interventions for CAP Strategic Plan
Date: Friday 27 August 2021 11:52:23

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To Whom it may concern,

I am providing some feedback following the town halls and viewing the Intervention document.

[REDACTED]
[REDACTED].

I am a young farmer, hold a Bachelor's Degree in Agricultural Science (Animal & Crop Production).

The scheme of particular interest is the Suckler Carbon efficiency programme,

I note one element of the scheme is that the participant must be a member of the Bord Bia beef scheme. For someone in my position participation in such scheme doesn't add any benefit to my farm holding noting all cattle sold for beef production are sold <18 months (mainly as weanings) hence no QA payment on point of live-sale. In such a scenario the purchase by a beef finisher (who is QA assured) will ensure that animal meets the specification (low number of movements and >70 days in the herd). Assume most beef finishers should be quality assured to avail of 20c/kg bonus at Point so sale.

In the event a Beef finisher is not Quality assured and purchases weanings/light stores from a Suckler farmer who is quality assured , I assume this animal doesn't qualify for QA status at finishing time.

Highlighted the last scenario what is the benefit to The suckler- weaning/store producer for participation in the Bord Bia scheme and how will it provide a positive impact for market competitiveness ??

Another element of the scheme in question is around the reference period and proposed capping of cow numbers over the 5 year period.

For individual like myself [REDACTED] and have developed my numbers over the past 4 years hence my numbers have increased gradually in line with development of adequate housing under TAMS, and improvement of land to cater for stock and inheritance of additional lands. Therefore an average number over a number of years is not relative to my current number therefore I significantly hope for people in my scenario that there is flexibility in the reference number. I note there was mention of the impact of BEAM hence an average was suggested. Could I suggest " The higher of 2021 Cow numbers or a 3 year average" noting would this not take everyone into consideration ??

In relation to the Capping of Cow numbers for participation in the programme. The scheme is called "efficiency" programme. My understanding of the definition of same is the fundamental reduction in amount of wasted resources that are utilised to produce a given number of goods and services. I acknowledge this is an environmental scheme however assuming clients meet the targets of the scheme they are increasing their environmental efficiency. Capping numbers has no correlation to efficiency. I note that Suckler is the only sector targeting for capping of production (under this scheme) in this document. Surely in the equity of fairness if a cap on stock numbers is a strategy is taken this should be applied evenly across all farmers nationally. Acknowledge that this is applied as a condition to this scheme but when viewing gross emissions it is difficult to comprehend how a dairy farmers (for example) can continue to expand numbers noting dairy cows have higher emission output and a suckler farmer won't noting the expansion

in the suckler cow numbers will be small in % terms noting given the market parameters suckler farmers need the support of this scheme.

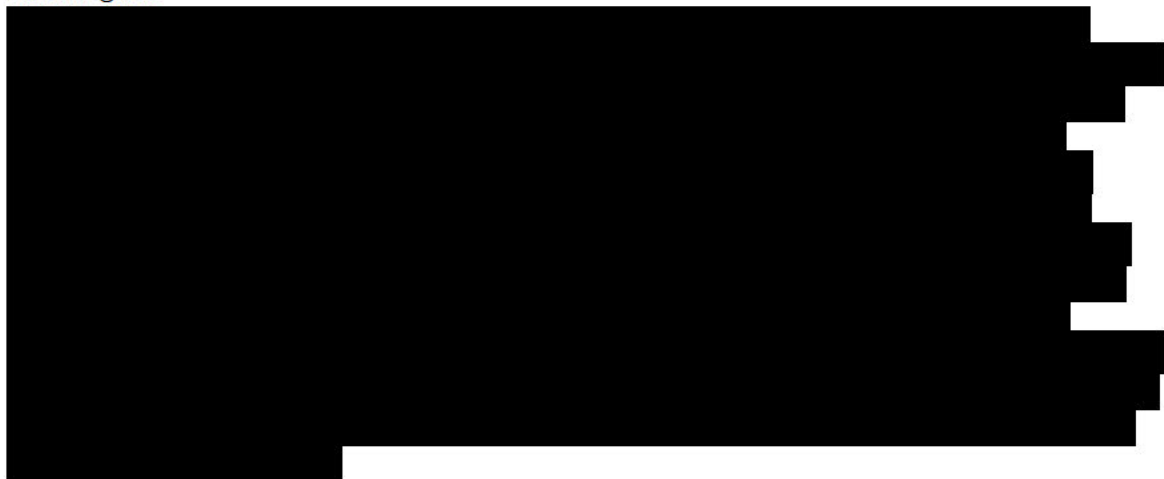
I don't agree with the absolute capping of numbers however agree there should be some parameters on same. Some examples may include capping % increase in cow numbers allowed per annum, expansion only allowed where KPI's as per scheme are achieved at high levels (as increased cow emissions are offset by increasing efficiency), displacement to other stock on farm to be replaced by cows perhaps, inclusion of additional lands perhaps , expansion to be allowed only on appropriate stocking rates /fertiliser utilisation ie proven by improving soil fertility etc, genetic merit of increased numbers has to be among Top 10% . These are very broad examples however consideration should be given to sustainable expansion noting the participants in this cohort are likely to be the most efficient suckler farmers. This would tie in with the term "performance based" which is highlighted in the document on several occasions.

Few other Points to Note with previous schemes and would suggest the following points for consideration in deriving new schemes.

- For an individual who commenced farming in 2017 they were excluded from the GLAS scheme which now stands at €20k income for-gone. Acknowledge the scheme was fully subscribed however this doesn't support a young farmer (Strategic focus as per document) and reduces participating in environmental schemes. Would significantly consider how this can broadened going forward.
- My Understanding is BDGP was under subscribed. I would consider same closely when making conditionality on the above scheme. Is a high number of farmers improving efficiency better than a smaller cohort not been allowed to expand from an emission perspective?? Note any individual who had increased their numbers over the reference number in the past programme and made an application to increase same was not accommodated despite full compliance and surplus budget available in same. Again doesn't support a young farmer or promote encapsulating the wider audience.

The schemes are very much based on a point in time and generally always look backwards not forward providing minimal flexibility for inclusion. This should be considered for changing circumstances , young farmers etc

Kind Regards



From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Submission on Draft Interventions for CAP Strategic Plan, Consultation 2021
Date: Tuesday 31 August 2021 14:20:17
Attachments: [0821 Submission on draft interventions for CAP Strategic Plan.docx](#)

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Hello,

Please find below and attached submission regarding the latest Irish proposals for the CAP.

Regards,

[REDACTED]

Submission on draft interventions for CAP Strategic Plan, Consultation 2021

- The CSP must take due account of the [Climate Action](#) and Low Carbon Development Bill 2021, SDGs, EU Directives, ever graver IPCC and COP alerts and other relevant policies, laws and realities.
- [The European Court of Auditors](#) report of June 2021 concluded that €100 billion of CAP climate action funds were spent on low-potential mitigation measures that made "little impact" on greenhouse gas emissions, adding elementary recommendations.
- Of the post-war Marshall Plan, from which the CAP evolved, [Bernadette Whelan](#) noted that "the Marshall Plan focus on public-private partnership, trade liberalization, freeing up intra-European payments and trade, market organisation and financial stability were its most enduring legacy reinforcing to-day's dominant neo-liberal economic ideology".
- Traditional farming is not unskilled labor of undeveloped people. On the contrary, it requires refined knowledge, potentially binds communities in shared goals, fosters health of body and mind, improves regional quality of life and can successfully address climate change.
- Optimum rather than optional take-up of new eco-schemes should be arranged and the entire budget used. In no cases should farmers receive Green Certificates and payments for extractive toxic practices, as has been happening. Resilient rewilding and regenerative practices should be ostentatiously and consistently rewarded.
- Several controversial schemes regulating the 600,000 Irish suckler cattle include a herd limit which inexplicably has not been replicated for the 1.6 million dairy cows in the country. Indeed, reform of the dairy sector, the most serious climate offender is largely ignored except for add-ons such as proposing that the dairy sector breed calves for the dry-stock beef sector, thereby making the suckler business redundant. In this manner, dairy

farmers are expected shortly to absorb the country's suckler business while diverting economic incentives from low-impact dry stock farming. This prospect has been met with objections that need to be fairly addressed.

- The Protein Aid Scheme is good, encouraging farmers to grow animal fodder instead of importing high-carbon brands, including genetically-modified soya from the Amazon Rainforest.
- Efforts to meet growing consumer demand for more organic food through the Organic Farming Scheme are worthwhile.
- If GAECs are allowed to be interchangeable with EU Directive SMRs, can they make much difference at all?
- Capping some payments, with the EU deducting 10% from all to then redistribute and top up small to medium farmers towards 'convergence', or greater equality, by bringing entitlement values towards a national average value under CRISS, looks like a positive step towards enhancing equality. A 100% convergence goal is a move towards fairness, and timely as smaller farmers are less environmentally destructive.
- It would make far more sense to cap payments at a much lower band, at around €30,000, rather than the two alternatives stated of either €66,000 or €100,000, as most small to medium-sized farmers never earn €66,000. Capping hectares instead of payments should be considered for greater effect, which should bestow security on vulnerable farmers similar to what basic income payments for all farmers from Pillar II, echoing De Valera's 'farmers' dole', or a society-wide version, could do.
- With many farmers in debt, they need alternatives that protect their incomes. An obvious one is restoring pricing that is explicitly in line with food quality, but contracts, payments and arrangements are often kept confidential, preventing transparency. A UK Parliamentary Committee investigating meat contract anomalies led to the drafting of a Fair Trading Bill, but this issue remains problematic on both sides of the border, and badly needs redress.
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- DAFM should liaise with providers of alternate and equally valuable schemes e.g. Natura 2000 which protects

“environmentally sensitive” sites, in which Ireland is very poorly represented. [European Innovation Programmes \(EIPs\)](#) are another excellent option, about twenty of which successfully operate in Ireland e.g. the Bride project. Their evidence-based results deserve wider circulation for training and replication. Funding from Pillar I Eco-scheme funding might better suit.

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- Galvanising bodies like CAFRI, Teagasc’s UK counterpart, and European bodies to work towards common goals together is vital. Most transborder initiatives are EU-funded, with the dairy industry, however, capturing most resources again. England is preparing to use the opportunity Brexit presents to replace CAP’s area-based farm support payments with the Environmental Land Management Scheme (ELMS), based on the endangered principle of ‘public money for public goods’ and results-based payments. This could embolden other countries to demand new terms, which should be closely monitored.

- Emission reduction goals need to be more explicit. Farmers who use artificial fertiliser and slurry often pollute running water flowing through compliant farmers’ lands, invalidating Eco-Schemes. ‘The polluter pays’ principle should be enforced by the Environmental Protection Agency (EPA) and local authorities. Small farmers who do less damage deserve better treatment, payments and support for fair transition. The EU allows only very limited use of animal and human manure for biomass fertiliser which, having low Biochemical Oxygen Demand (BOD), causes much less toxic damage to water, land and air than slurry or silage, both of which are approved. Though consumers increasingly prefer free-range poultry, bound by many rules,

there is little impetus to switch from the massive consortium-driven factory-farm industry supporting chemical spraying and other toxic practices. These trends are relevant to the Draft Nitrates Action Programme. Proper small-scale [regenerative farming](#) could outstrip EU Pesticide Directive recommendations, and even organic standards if meaningfully backed. Instead, sole traders of fruit and vegetables and small networks will lose out on benefits unless they surrender autonomy to the handful of conglomerates worth at least €2.5 million each, which is completely unrealistic and useless to most organic producers, while Ireland's dairy herd swells with concomitant soaring [methane](#), a greenhouse gas 84 times more potent than CO².

Considering the [Stockholm Resilience Centre](#) recently confirmed runaway nitrates releases as the biggest biosphere risk, conserving and even expanding nitrogen-intensive dairy herd size, looks criminal through the lens of nature and human rights.

- To streamline certification of organic farmers, they could be grouped under [EIPs](#) to save on bureaucracy. Since 1986, German organisation [Land-Care](#) has evolved public goods metrics now accepted at EU level where bonuses are proposed for biodiversity. With offices being located in Brussels, Landcare can affect the European Parliament and CAP. [The Green Foundation](#). [Talamh Beo](#) and [Cultivate](#) have started to partner with them, to get about fifty farmers to sign up to a five-year EIP based on the Landcare model. This pilot should place participants on a firm footing. Since many farmers think environmentalists don't care about their livelihoods, EP hopes to persuade farmers to the contrary through this alliance. CAP must encompass and nurture a rapidly-growing number of such multi-beneficial initiatives.

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- If Northern Ireland supplies most of the Republic's milk for retail, why is the south exporting dairy, instead of shortening supply chains? Quantities of goods exported, including apples and salmon, frequently equal quantities being imported, which in turn are often sourced from sites of inhumane labour conditions. Teagasc's investment in exporting ever greater volumes of powdered milk formula, to reportedly raise consumption by from one in seven to one in five babies around the world, is opposed by

EP as Ireland has to carry the externalities of more methane, water impurities and rapidly degrading land (soil fertility has dropped 40% over fifteen years). It's time this unsustainable growth gets onto national agendas for responsible debate.

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Submission on draft interventions for CAP Strategic Plan, Consultation 2021

- The CSP must take due account of the [Climate Action](#) and Low Carbon Development Bill 2021, SDGs, EU Directives, ever graver IPCC and COP alerts and other relevant policies, laws and realities.
- [The European Court of Auditors](#) report of June 2021 concluded that €100 billion of CAP climate action funds were spent on low-potential mitigation measures that made “little impact” on greenhouse gas emissions, adding elementary recommendations.
- Of the post-war Marshall Plan, from which the CAP evolved, [Bernadette Whelan](#) noted that “the Marshall Plan focus on public-private partnership, trade liberalization, freeing up intra-European payments and trade, market organisation and financial stability were its most enduring legacy reinforcing to-day’s dominant neo-liberal economic ideology”.
- Traditional farming is not unskilled labor of undeveloped people. On the contrary, it requires refined knowledge, potentially binds communities in shared goals, fosters health of body and mind, improves regional quality of life and can successfully address climate change.
- Optimum rather than optional take-up of new eco-schemes should be arranged and the entire budget used. In no cases should farmers receive Green Certificates and payments for extractive toxic practices, as has been happening. Resilient rewilding and regenerative practices should be ostentatiously and consistently rewarded.
- Several controversial schemes regulating the 600,000 Irish suckler cattle include a herd limit which inexplicably has not been replicated for the 1.6 million dairy cows in the country. Indeed, reform of the dairy sector, the most serious climate offender is largely ignored except for add-ons such as proposing that the dairy sector breed calves for the dry-stock beef sector, thereby making the suckler business redundant. In this manner, dairy farmers are expected shortly to absorb the country’s suckler business while diverting economic incentives from low-impact dry stock farming. This prospect has been met with objections that need to be fairly addressed.
- The Protein Aid Scheme is good, encouraging farmers to grow animal fodder instead of importing high-carbon brands, including genetically-modified soya from the Amazon Rainforest.
- Efforts to meet growing consumer demand for more organic food through the Organic Farming Scheme are worthwhile.
- If GAECs are allowed to be interchangeable with EU Directive SMRs, can they make much difference at all?
- Capping some payments, with the EU deducting 10% from all to then redistribute and top up small to medium farmers towards ‘convergence’, or greater equality, by bringing entitlement values towards a national average value under CRISS, looks like a positive step towards enhancing equality. A 100% convergence goal is a move towards fairness, and timely as smaller farmers are less environmentally destructive.
- It would make far more sense to cap payments at a much lower band, at around €30,000, rather than the two alternatives stated of either €66,000 or €100,000, as most

small to medium-sized farmers never earn €66,000. Capping hectares instead of payments should be considered for greater effect, which should bestow security on vulnerable farmers similar to what basic income payments for all farmers from Pillar II, echoing De Valera's 'farmers' dole', or a society-wide version, could do.

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✓ KILBARZ / WEST WICKLOW ZFA
[REDACTED] R.D.C.

Wed. 1st Sept 2021.

To whom it may concern,

while the on-line meetings were a success only the select few got to voice their views.

Here are some of our proposed interventions on the CAP STRATEGIC PLAN 2023-2027.

1/ The 1.5 Billion Carbon TAX money, promised in the programme for Government, must be used as a new REPS type scheme and cannot be used for co-financing in the new CAP (Pillar I).

In addition up to 57% has to be co-funding in Pillar II, the government must fund all schemes to a maximum level in next CAP.

2/ No CAP on SUCKLER HERD and a minimum of €300 / head.

3/ No Bord BIA (Mandatory) in any of the schemes.

4/ DAIRY MUST BE INCLUDED IN 7AMS.

2)

5/ NITRATES ACTION PROGRAMME will increase on farm costs and will reduce agricultural output, i.e. clampdown on slurry management and spreading; the reduction in chemical nitrogen allowances and maybe lower stocking rates in Dairy Herds. Needs to be greater consultation with Farmers on all of this. Our Dairy Herd is the most efficient sector in the world.

6/ New E.I.D Tagging of Calves must be funded by Dept. of Agri; not at farmers expense like RDOF (tagging); and all the other add-ons.

7/ RWE Scheme must deliver at least £30 / head.

8/ No where in any of the 2 Booklets, produced by Dept of Agri do I see the mention of Viability of FAMILY FARM, most are below the viability threshold (income).

9/ RURAL DEVELOPMENT - FAMILY FARM children must be able to build (Dwelling House) on their own land, where their work is.

10/ T.B issues must be resolved.

11/ MEDICINES (VETS); FARMERS must have access to the book

③ I will just leave you with my last thought;
When [redacted] was E.U. Agricultural Commissioner, he said the E.U. would bring in Simplified rules and regulations for Farmers, things made easier with less Red Tape, but I'm afraid in this new CAP, nothing could be further than that.

GAEC's / Eco-schemes on a scoring basis/
The number of different schemes, dates to comply by.

The ordinary FARMER works on average 15 hours / day / 7 days of the week and the amount of bookwork is out of this world.

With that, I thank you for your time and we look forward to working with you in the Department of Agriculture.

Regards.

[redacted]

Kildare / West Wicklow
Rural Development
Committee.

There are many more points I could have raised, but am sure, everything will come up time and again, in other peoples submissions.

12/ Small Horse Breeders to be added TAMS scheme. (FARMER).

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Submission from [REDACTED]
Date: Friday 3 September 2021 17:19:28

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[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

To: Department of Agriculture, Food and the Marine

Re: Public Consultation on the Common Agricultural Policy. September 2021.

I have owned land since [REDACTED]
[REDACTED]

to develop my suckler herd farm. I have since built up a quality suckler herd using artificial insemination sires of various beef breeds.

1.
Very few real farmers know about this consultation because it was not advertised enough. I have contacted a few farmers and include their views here.
2.
The topic must be viewed against a background of climate change and energy policy in the EU and in Ireland. There is hysteria about climate change which is causing chaotic renewable energy policies such as wind and solar energy and battery storage. There is now a realisation in Ireland that it is not working with plans to install more fossil fuel generation capacity, not less. Government will not conduct the necessary assessment under the SEA Directive and there is no more can be done.
3.
The first rule of agriculture is to take care of the land and the livestock. Succeeding educational colleges instead teach young farmers to ignore that and to evaluate livestock on a purely commercial basis. In my case I use artificial insemination which requires heat detection in cows. Sometimes I fail to detect heat and have to wait 3 weeks more to have the animal served. Some farmers do not properly observe female cattle and assume they are infertile. Then they sell them for beef. This removes these excellent breeding stock from the herd for no good reason. Better instruction on heat detection and less on pure unlimited

economic decisions is called for and recommended here. Some farm the land with too much stock that it damages the land. This is not ideal.

4.
State aid is paid irrespective of holding size, it should be done to promote smaller units that have high quality environmental care and animal husbandry. My subsidies are mostly based on the years up to 2006 when I was developing a herd and is therefore very low. The state aid should be adjusted more often so as not to discriminate against the retiree.
5.
In my case I was away from my farm in a full time job and returned at [REDACTED] to full time farming. This is very common in rural Ireland now. Some schemes require courses to be completed before the age of 40. Where a farmer has children they too are away working and he runs the farm. If a child takes over the farm he/she could be well over 40 years old before they are in a position to attend a course. I recommend that prospective farmers should be allowed complete courses at any age because people are living longer now.
6.
Presently dairy farmers appear to be making most money and other non dairy enterprises cannot compete in buying or renting land. More balance is required.
7.
I participated in the Irish Beet Genomic scheme to improve herd quality. It was poorly launched and many farmers did not know they could change heifers selected. This should not happen again. In my case I was required to continue in the scheme after 2020 to keep the payments coming. I might have to sell a lot of stock to buy a farm close to mine. I left the scheme because I was afraid if I sold most of my herd I would be forced to repay the grant money. This is not a good situation. The scheme tied farmers down more than was necessary.
8.
I found farm organisations do not properly represent farmers in sufficient detail. Therefore problems like I outline above need to be taken into account.
9.
There are plans to import unlimited amounts of South American meat into the EU. This will be produced by destroying the pristine rain forests and the habitat of thousands of species. Irish beef is tightly regulated while there are less regulations on South American meat. It is unacceptable that I should be forced to compete with such environmentally destructive sources.
10.
The habitat of species like the Orangutan and many other species is being destroyed to produce biofuel. I feel very aggrieved at being forced to use biofuel which has been produced by the destruction of such habitats.
11.
I recommend that the likes of Greta Thunberg, a 17 year old school drop out

should be ostracised for influencing any policy. She is not a scientist. Real farmers have to work hard and you need to encourage new people to continue to produce good food.

12.

I am currently being told to reduce emissions while data centres have been invited into this country to process information for the whole world. Demand for electricity has gone up by 23%. Some of this is been used by wind farms but most of it is being used by data centres. In Ireland, Dublin city is the centre of political power and the politicians are prepared to sell out Irish farmers to reduce emissions while promoting high emitting data centres which will need 100% fossil fuel based on my observation of Eirgrid's dashboard this summer.

Yours faithfully,

A solid black rectangular box used to redact the signature of the sender.

From: [REDACTED]
To: [CAP Strategic Plan](#)
Cc: [REDACTED]
Subject: Draft Interventions for CAP Strategic Plan
Date: Friday 3 September 2021 16:48:31
Attachments: [CAP Submission.doc](#)

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Hi,

I attach my submission on the CAP Strategic Plan 2023 - 2027 Public Consultation on Proposed Interventions

Regards,

[REDACTED]

CAP Strategic Plan 2023 – 2027 – Public Consultation on Proposed Interventions

I set out hereunder my observations and recommendations in connection with the above.

4.1 Targeting/Distribution of Direct Payments

- Ireland should implement capping at an effective rate of €66,000
- Convergence in fairness should not stop at 85%, but should increase to 100%
- Ireland should go beyond the 10% of direct payments to redistribute from larger to smaller or medium-sized holdings and this funding should be redistributed to farmers with holdings of less than 30 hectares
- There should be no reduction in the 25% of direct payments for eco schemes; if anything it should be increased.

Small and medium sized landowners are at a disadvantage at present especially where options are not available to buy or lease additional land. If they are to survive into the future and contribute to halting and reversing biodiversity loss, enhance our ecosystem and preserve habitats and landscapes, they will need additional support. These farmers are more likely to embrace and support the new approach to environmentally sustainable farming practices.

Gender Equality

In this case I recommend the introduction of a more family oriented approach to how females and other family member's enter/re enter farming,

The Teagasc Pathways to a 'Green Cert' needs to be expanded to provide for more flexible approaches to enable sons and daughters to obtain this very valuable qualification. It is essential for future agricultural development and our rural way of life including succession planning, that everything possible is done to encourage participation by those, who for whatever reason, are finding it difficult to participate.

Take for example, those from farm families, who emigrated to Australia, Canada, New Zealand etc. to find work after the collapse of the economy here in Ireland, many are returning home to family farms, others are planning to come home when the pandemic has passed, these men and woman need to be supported. Many of them are married or have partners and will need to work off farm to make a living in the short to medium term, so maximum flexibility is needed and use of online technology etc. to encourage them obtain agricultural qualifications like the Green Cert. If the person is the sole heir and has to work off farm to make a living initially it is very difficult to get time off work to participate in days away etc., so serious consideration should be given to working smarter. The various lockdowns over the last eighteen months have demonstrated that new approaches have been developed for almost everything we do, so this issue is not insurmountable. Also the IDA, Enterprise Ireland, LEOs etc are offering financial and other assistance to support job creation in the economy, this should be matched in the

farming community and every support provided to give young women and men the means by which they can enter the industry and be part of its development and modernisation.

Proposed Intervention Outlines

5.1 Pillar 1

(1) Definitions

Eligible Hectare: The proposal to allow up to 25% of a parcel... or biodiversity to be considered eligible. I recommend that the percentage is increased to at least 50%. If the entire area is “beneficial” why not include 100%?

Young Farmer: Why have a cut off at 40 years of age? Why not 45 or 50? Each case should be considered on its merits as the present age limit is discriminatory and would not be acceptable in any other employment\profession.

Active Farmer: Provision should be made for force majeure etc. The following should be taken into consideration when assessing eligibility:-

- All stock on the farm throughout the year and not just on census day which includes purchases\sales etc. Regard must be had to maintaining a low stocking rate for environmental, biodiversity and climate benefit.
- Condition of land
- Silage\hay\bedding saved
- Drains, hedges, walls, trees etc maintained
- Environmental schemes participation
- Natura 2000 (SAC) conservation actions
- Contribution to biodiversity, preservation of habitats and landscapes.
- Importance of the overall farm management to halting and reversing biodiversity loss and preserving habitats and landscapes
- Previous good farming practices e.g. participation in AEOS GLAS REAP and such schemes.

(5) Eco Scheme

Recommendations:

- The maintenance and protection of existing hardwood trees and trees planted under previous environmental schemes should be eligible for support under the new scheme. Many small farms contain large mature hardwood trees planted 50 – 100 years ago which are a wonderful environmental resource and should attract special protection. Farmers are not given any credit for biodiversity and carbon sequestration value of trees or tree lines. This is changing for hedge rows under REAP. If tree planting is encouraged, then farmers should not be permitted to fell

existing mature hardwood trees and should be restricted to maintenance\branching same only.

- There should be a **new bespoke category** which would enable farmers to submit their own actions which would be eligible for financial support e.g. facilitate the development of new frog habitats which were common in the past, but have declined due to drainage. I am sure there are other examples.
- The plantation of new hedgerows and trees and recognition for planting under previous environmental schemes. REAP acknowledges hedgerows, but does not reward previous tree planting
- Special recognition and support for **certain tree groups** such as the hazel should be incorporated because of their multiple wildlife benefits.
- The presence of clover should be included for consideration because it can fix large amounts of Nitrogen from the air, thereby reducing the need for artificial fertiliser.
- Existing stone land drains which are very common in the west and North West of Ireland, should be included for support, as in many cases, they are the most sustainable way of maintaining drainage in soils which contain iron ore. Modern plastic drainage pipes only work for a short time.

It is essential that funding be included in the grant support to cover the capital costs of purchasing and planting trees and hedges. A local supplier has recently informed me that certain species of trees are in short supply and have become more expensive

5.2 Pillar 11

(1) Agri-Environment Climate Measure (AECM)

I agree with the 'results-based actions approach' which is being piloted through REAP.

Taking on board your statement:-

"underpinning principle for the scheme will be 'the right action, in the right place' in order to.....in an integrated manner on farms"

I agree wholeheartedly with this principle and trust that there will be resourcing by way of personnel and follow through on implementation. Such action is also needed in SACs. Natura 2000 designated lands are unique and very diverse across the country, however there appears to be very little engagement with farmers or a reluctance to consider how such land can be improved by restoring priority habitats, carbon storage, water quality etc. I am aware of Natura lands (adjoining rivers) which have deteriorated over time and engagement is required between farmers and the NPWS to consider and agree how sustainable improvements can be made. A bespoke approach which would also help farmers to better graze such lands, should be adopted to protect biodiversity like the River Finn SAC which is the most important Salmon River in the Foyle System.

Tree planting on small farms should not be restricted by imposing minimum areas, but should be permitted wherever the farmer can plant small plots or on land that is inaccessible etc.

(2) Agri-environment Climate Training

I disagree somewhat with the general thrust of the training approach outlined, anecdotal evidence persists that many farmers are not engaging in a holistic way with the new approach to environmental protection, including biodiversity, and climate action. More engagement with farmers and knowledge transfer is needed to address this matter.

(4) Areas Facing Natural Constraints (ANC)

Proposed Support rates/financial allocation

Eligible beneficiaries – minimum of 3 hectares of forage and arable land

- There should be some flexibility in relation to the minimum 3 hectares for farms. I am aware that some sheep farmers are working at 2.9 plus eligible hectares at present but do not qualify. They wish to expand when additional land becomes available for lease or purchase. Please take this unfortunate position on board and amend the rules especially in the cases of existing farmers.

(8) Sheep Improvement Scheme (SIS)


- The scheme should run from January to December unlike at present.

Proposed Structure

- In the case of small flocks on SAC lands or where a farmer uses an off farm Genotyped ram, this should be acceptable. Accordingly some flexibility is desirable.

General recommendation

- Small farmers should be exempt from contributing to the national reserve for young farmers

 - Submitted by email Friday 3 September 2021

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Submission
Date: Friday 3 September 2021 18:40:56
Attachments: [CAP Consultation response](#) [REDACTED]

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Hello and thank you for receiving this submission.

It is partial and details only some points around specifically climate and environmental measures.

Due to work constraints/pressures this is the best that I can do for now to extend some small voice in the short time I had available to treat the matter.

If there is any extension please let me know by return email

Many thanks,

[REDACTED]

Due to time constraints this response is being submitted as an individual submission from [REDACTED], [REDACTED]. It is incomplete, given other work constraints, and has not been reviewed or edited. I thought better to submit than to forego the opportunity, but would welcome a further extension to bring in team members specialist focus.

This consultation response will focus on the three primary EU objectives:

- (i) to foster a smart, competitive, resilient and diversified agricultural sector ensuring long term food security;
- (ii) to support and strengthen environmental protection, including biodiversity, and climate action, and to contribute to achieving the environmental- and climate-related objectives of the Union, including its commitments under the Paris Agreement;
- (iii) to strengthen the socio-economic fabric of rural areas.

And also three of the nine specific objectives with a climate/environmental focus:

- d) contribute to climate change mitigation and adaptation, including by reducing greenhouse gas emissions and enhancing carbon sequestration, as well as promote sustainable energy;
- e) foster sustainable development and efficient management of natural resources such as water, soil and air, including by reducing chemical dependency;
- f) contribute to halting and reversing biodiversity loss, enhance ecosystem services and preserve habitats and landscapes;

Also: fostering and sharing of knowledge, innovation and digitalisation in agriculture and rural areas, and encouraging their uptake, through improved access to research, innovation, knowledge exchange and training.

Sections on :

Young Farmers:

Of the 3% allocation to young farmers there needs to be a New Entrants program to fill the coming gap, and designed around land stewardship and regenerative agricultural practices. The stats on new entrants and farmer demographics show the threat of a likely land consolidation and potential speculation trend to come. To stem this we need a new cadre of young farmers.

Today the pester power around Climate coming from the Greta generation will lead to impassioned pursuit of solutions focussed motivation to work with the land and landscapes. Meanwhile ecosystem service valuation is leading to income supports for ecological land management. This opportunity to attract new entrants to agroecological farming should not be missed.

Eco-Schemes :

The 25% conditionality of BPS for eco-schemes is enough and should not be expanded unnecessarily, but neither should it be reduced beyond 20% by derogation. There is a danger here that poorly thought out measures will create problems further down the line and hence the ecoschemes should plan for monitoring and review in keeping with the retooling of environmental payments at EU level as “payment for results” .

Also these schemes should be well researched and based on holistically integrated science - soil, biology, ecology and climate sciences. Schemes should be further thought out to avoid unintended consequences, e.g. **reincorporation of straw** leading to lack of straw bedding, leading to incentivising peat extraction for animal bedding. Also reincorporation of straw has been shown to compound compaction in certain soil types by increasing likelihood of anaerobic layering of decomposing material beneath the soils surface, while the act of reincorporation itself, based on tilling, releases CO₂ in the process. A viable alternative would be where the adoption of no-till seeders, biostimulants, and roller crimpers can be used to achieve better results and transition out of chemical N in a 5 year cycle, while also building soil organic carbon.

There are a range of eco-cheme possibilities that make sense in the first instance without requiring much thought. In our program at Farm Carbon EIP, we have found a lack of uptake from the Dairy Sector, though this is generally agreed to be - “not surprising”. Still, in this Dairy context, the lack of openness to innovation in the ecological approach to the sector is unwise given the level of available and proven research on measures that can have serious impacts on water quality, soil health, and emissions profiles in these settings. There seems to be a stubborn division in place between this sector and the environmental requirements of the time and all efforts to avoid heads being buried in the sand need to be excercised.

Protection of existing grass/plant/sward diversity

The most obvious measures are the **protection of existing grass/plant/sward diversity from reseeding**. The logic here is that for decades now, mono and low diversity cropping grass and sward mixes have been bred for yield response (by weight not nutrition) to chemical nitrates. The reseeding of diverse and high value traditional grasslands with these seed mixes is only a recipe to compound the existing issues further down the line. Hence the need to first steward or protect what is already there as it will be the seedstock for ecologically indigenous and nutritionally high performing sward mixes into the future.

Multi species swards

For reseeding where it is of benefit, e.g. for the replacement of monocrop and low diversity swards, **multi species swards**, with particular focus on **functional diversity** of at least 4 species, should be applied with attention paid to particular species of tanning producing plants that can simultaneously lower methane emissions from cattle. The logic of multispecies swards is quite simple. We have been using chemical inputs to replace natural processes for half a century now in Ireland, without examining natural processes and ways of accelerating their performance. Diversity in the sward is like diversity in the diet. Each functional species of plant synthesises nutrient in a different way from different depths in the soil profile. The diversity of nutritional bioavailability in the soil adds to the diversity of microorganisms, fungi, bacteria, micro-arthropods etc. These cycles of predator-prey relations and symbiosis within the soil yield in return more available nutrient to the plants themselves and from this we get a more vibrant growth in the sward while reducing chemical pressure on soil and water, increasing animal health, reducing veterinary costs, drought proofing of grasslands, increasing water infiltration on land (nature based flood mitigation),

reducing farm costs in terms of chemical inputs post transition phase, and creating a new research development and commercial sector in the biostimulant and organic amendment space.

Rotational “mob” grazing

Multi species swards should not be seen as a stand alone measure, and there should be an understanding that adding clover does not equal functional species diversity. The technique should be used in conjunction with **planned rotational grazing**, termed holistic planned grazing, **mob grazing**, or by whatever name. High density stocking with daily rotation in small paddocks of multispecies swards leaving a 60 day rest period is shown to have significantly beneficial effects above and below ground level. Hydroxyl ions from evapotranspiration break down the methane molecule and plants grazed by one third their growth produce growth enhancing hormone such that the CO₂ from the broken methane molecule, being heavy by attachment with water vapor is reabsorbed at ground level into the growth of the diverse sward, lowering methane emission rate and sequestering CO₂ within the plant and soil growth cycles.

Biostimulants and Beneficial Microorganisms

Soil scientists in the last 2 years have debunked the old paradigm of ‘recalcitrant carbon’ and ‘humus’ and this is reshaping our understanding of just what is happening in healthy functional soils. Our current methods are not in the interest of soil diversity, climate, and definitely not in the interests of local or global food security. The thinking has to change in keeping with the times. There are no complex carbon chains, but monomers, simple sugars, and an abundance of life in healthy soils. There is nothing that the soil will not break down into simple components. We need to be aware of this, and to work with the best emerging science in terms of ecologising our science based approach and replacing the industry lead and chemistry based dominance in the sector.

The use of **biostimulation**, which involves the brewing and application/innoculation of soils with beneficial microorganisms, has been demonstrated to profoundly influence soil health in short time frames. Used in conjunction with the above techniques of sward management and planned grazing, transition times from chemical to biological methods can be accelerated. There is a lack of indigenous research in this area to date, but beginnings have been made by projects such as Danú, and private entities such as Nova Q and others. There is no dedicated organic technology research farm for regenerative agricultural techniques in Ireland.

Riparian woodlands and Deep Peat Forestry

Research has shown that a 15m woodland buffer will catch 95% of agricultural runoff before it hits the water course. The national forestry standards manual classifies a minimum width of 20metres for ‘forestry’ classification.

Many deep-peat Sitka plantations are being deemed non-viable and there are whispers in the Forestry Service that the best thing to do in many cases is to “walk away” from these deep peat plantations. This thinking is based on the disturbance of soils in the process by heavy machinery. In the agricultural sector, we have to remember that we are not dealing with the same scalar issues as the Forest Service, and we should not simply walk away. There is an appropriate scale, with machinery for low impact removal of trees from vulnerable sites and this area should be explored.

Recent research has shown that planted deep peat is emitting 3 times the formerly estimated levels of greenhouse gasses. Reporting mechanisms from IPCC mandate that all

felling results in 100% oxidation of these forests and so felling has been deemed ineligible in carbon terms when accompanied by heavy disturbance of forest soils. Neither of these assumptions are valid if the system is properly thought out and measured. We recommend the establishment of EIPs of AECM trial teams to conjoin research with implementations in on-farm and in-field based trial works to establish the parameters for schemes that can reduce the exchequer impact of LULUCF emissions accounting post 2026 when managed wetlands enter the accountancy rules.

One such potential scheme that should be investigated for application in the context of peatland rewetting as part of the 4 pillars of the EU Carbon Farming Initiative is the deforestation of agriculturally based deep peat and its rewetting. This can be accompanied by the replacement planting of riparian woodland buffers in 20m bands along the banks of rivers and the proper buffering, fencing, planting, and optimum inclining of on farm drains and first order streams.

This replacement planting satisfies the 2017 policy stipulation on replanting post deforestation, while adding a relatively easily applied ecoscheme that can increase the reportable planted forest cover area, another point of national interest. Leaving the peatland areas open for controlled rewetting, and not reducing the national forest cover level at the same time.

Peatland Rewetting

Peat soils account for 21% of our land base, and yet we do not see equivalent share of CAP supports for their stewardship, protection, and management. Today we still see active encroachment on SACs and SPAs with farmers buying lands to drain and transition to grassland at rates comparable with and exceeding those efforts being made to go in the opposite direction. There must be both carrot and stick in this area. New drainage should be banned by legal sanction. Current lands must be mapped with granular detail beyond macro parcels and the technology is there to do so with relative ease. Farmer and community networks with turbary rights to intact but drained bogs should be facilitated in strategic approaches to their rewetting, and this married to renewable energy development in the surrounding communities via financial matching strategies developed on the avoided emissions from these areas.

The NPWS will need a partner equivalent to the Signpost farm and National Soil Carbon Observatory effort in this respect, measuring with eddy covariance flux towers emissions rates on drained bogs and updating with post rewetting figures for translation into saleable offset/inset tokens to finance a properly Just (as in justice) Transition.

Other Potential EcoSchemes

There are a variety of other ecoscheme and AECM scheme potential measures that should be investigated. For example, the removal of planning permission and widespread adoption of **reedbed filtered ponds for the capture and filtration of farmyard runoff** prior to its hitting water courses should be closely examined. Earlier this year we saw the planning permission requirement for solar panels on farm buildings removed. Likewise reedbeds built for these purposes could see similar treatment. The technique also acts as a biodiversity measure, with impacts on aquatic biodiversity, and water quality on a catchment basis.

The production and use of **Biochar** as a feed amendment, for application for NO₃ and ammonia reduction in slurry tanks and animal bedding, and as a soil conditioning agent for use in conjunction with **biostimulants** should also be examined, especially as a link in the chain between deforestation reforestation. Measures for **Biodiversity and Habitat supports** come in many forms from hedgerow management, to the support of soil biological diversity, measures for pollinators, birdlife, pond and wetland management, and the inclusion of

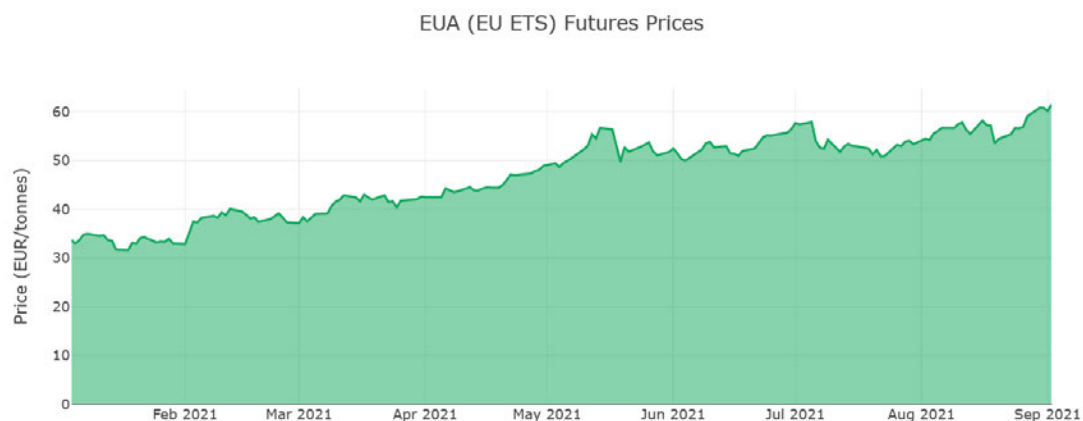
formerly considered marginal lands through integration of biodiversity finance with the activities of agricultural management all deserve the consideration.

Market based approaches

To get this area right we have to 'watch the market', as well as watching policy.

In terms of the market, last year in the first 6 months of 2020 there were 216 new asset management funds set up with a sustainability focus. This has been referred to as 'an arms race in asset management' by leading commentators. In this domain "ESG", or environmental social and governance metric assessment, is 'the new normal'. This is taking place because of climate concerns among company shareholders resulting to big board players being voted out of board seats, and hence boards having to act to derisk their reputation in the climate context. This meets with a movement among producer organizations and conglomerates whose production lines are under threat due to weather changes as a result of climate change who need to examine and derisk their own supply chains, again as a result of climate change. This is adding to a global groundswell of interest from 'environmental finance' in measures that can achieve production while maintaining or improving ecological performance at regional scales.

Adding to this dimension of environmental finance we also have the carbon markets, where today's price has broken the 60€ threshold for the first time:



The trend is obvious. Carbon prices are on the increase. And early adoption and co-regulation by the state with national level actors in this space will require careful handling. The balance must be struck between scientific rigor in MRV and research, with that of upskilling the agricultural sector starting with the lowest hanging fruit, which is also the area that poses the most significant economic and climatic threat here in Ireland, namely peat soil emissions.

For example, the rewetting of peat soil grasslands is worth over half a billion euro to the economy per annum at today's emission levels (8m t/CO₂/annum) if a system is put in place to accomplish the task in a measured and mandated way. If we do not deal with the problem of peat grassland emissions, this is how much the problem will cost the state annually.

At the **Farm Carbon EIP** we are working with actors from the agricultural and Forestry Service, other EIPs, national level experts, and international agencies in developing a scalable approach to this problem, however, we are well aware that this is the tip of the iceberg in terms of what can be done through ecological land management and the valuation of ecosystem service cobenefits through agriculture in Ireland.

We need to work actively on research and development in this area and through new institutional partnerships if necessary. We are available in our work and happy to assist the department in building networks and advancing this area through applied demonstration in the coming years. Properly resourced, this approach can combine the EU policy dimension with integrated private sector approaches at local level to achieve outcomes that work to support healthy landscapes and healthy communities.

EU Carbon Farming Initiative

In April of this year the EU launched its Carbon Farming Initiative with the goal of deploying an EU wide Carbon Farming Scheme, based on MRV and payment for results, by 2020. The initiative sets out a technical document detailing how this process should be delivered inviting applications through the LIFE programme to develop national pilots in preparation for this scheme's deployment. These pilots will examine specific measures to assess baseline conditions across a variety of potential measures not limited to a sample list given which includes the four pillars of Agroforestry, Mineral Soil Sequestration, Grazing/Livestock Management, Peatland Rewetting, and on farm emissions and energy profile and auditing.

Obvious overlap with Water and Biodiversity directives is implicit but not stated given the agricultural orientation of the model, nevertheless this should be actively understood in the spirit of being prepared by application of appropriate research in these areas on a measure by measure basis.

The EU Carbon Farming scheme welcomes the design and delivery of a variety of schemes and suggests a wide range of measures that should be trialed on a site specific basis. At Farm:Carbon, in conjunction with the delivery of a Scorecard and Payment For Results system for the rewetting of agricultural peatlands, we are keenly aware of both the market and policy approaches to the wider area of agricultural stewardship for 'secondary production' of ecosystem services. The development of this area will have significant effects on a variety of land types, including those formerly considered marginal, those under lease solely for derogation, and also for social and demographic factors in agriculture by opening the potential for new entrants to farming according to a model other than primary productivist conventional agriculture.

Development of Ecological Outcome Food Labelling

Many new examples of linking standardised ecological land use practices to food certification and labelling now exist and are gaining traction on the consumer side. In the national beef / suckler herd there are few measures in existence to support these developments. Direct sales to conscientious customers are also on the rise, especially those mediated through digital technologies. New certification and labelling systems linked to results based payments can be used to local advantage by supporting cooperative development among niche producers of high nature value and high quality meat products for localised markets in keeping with the national rural strategy and pillar II objectives.

35% of Pillar II for Climate and Environmental Measures

Old Leader programming saw more than double the budgetary allocation of funds from this pillar to schemes involving farmers directly. This has petered out in recent years and the reasons for this are the fact that the farming community have been fragmented in the same timeframe while business has overtaken as the primary concern. Hence, a strongly integrated community sector that are aware of and sympathetic with both farmers and

environmental concerns (e.g. the quality of their local drinking water) , with a resourced capacity to create organizational diversity to attract funds to these specifics is a key aspect. Pillar I should not forget Pillar II.

Examples of strategic development in these areas would focus on “resourcing the middle”, in terms of dedicated supports for the administrative preparation and financial resourcing of new agencies emerging in this area - for example : Rivers Trusts, Environmental Service NGOs, Farmer Lead Energy Cooperatives as SECs, Carbon Farming Networks, EcoTouristic trail and amenity projects, local food network developers, Community lead woodland initiatives, Community Farms and other Community Service Programs etc.

Leader in the last cycle has upped supports for private entities in many regions from their former 50% allocation to 75%, and this is not having the necessary impact on rural communities, but further centralising the spending and benefit of that spending. We need agricultural and rural communities to be properly supported and to have key design elements in place for this to happen.

Apologies for partiality.

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Submission for CAP Strategic Plan 2023-27
Date: Friday 3 September 2021 16:32:37
Attachments: [Submission to the Draft Strategic Plan 2023.docx](#)

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Dear committee

Attached please find my submission to the CAP Strategic Plan 2023-27

I hope you can give due consideration to my points of view.

Much appreciated

Kind Regards

[REDACTED]

Farmers
Co Galway

Submission to the Draft CAP Strategic Plan 2023-27

My understanding of the original objectives of Common Agricultural Policy (CAP) is that CAP was designed as a cheap food policy, to give the best of good nutritious food to the consumer as cheaply as possible. Therefore by interfering in the market place and in the supply and demand model CAP became an income support to farmers. So for CAP now to be moving in the direction of Eco-Schemes and increased Environmental ambition for Farmers to draw down their Direct Payment is detrimental to the viability of Farm Family Incomes and the survival of Farm Families.

The sustainability of Farm Family Incomes has to be balanced with the new Environmental ambitions proposed in the new CAP. Many Farm Families are dependent on direct payments for their farm business to survive and to meet family commitments, education costs, mortgage repayment, bank borrowings and repayment capacity. Some Farm Sectors are more heavily dependent on direct payments than others eg suckler cow, sheep and beef. Convergence will actually have a very significant negative effect on many small hectare farms that have a high per hectare payment. Eco Schemes have to be designed to be cost neutral to the Farmer. Eco Schemes need to closely resemble Greening. Eco Schemes need to have a widely received payment at the heart of Eco Schemes. The Farmer has to get back as direct income the amount of Direct payment redirected to Eco Schemes, BISS and CRISS at the least possible expense.

The value of a viable Agri food sector to Regional Employment, which is largely outside Dublin, has to be considered in this proposed CAP Strategic Plan. Also the spend by Farm Families and the spin-off from that spend indirectly supports schools, shops, agri stores and many businesses in Rural Ireland. The footfall and spend in the villages, towns and cities of most counties outside of Dublin is linked with the viability of Farm Family Incomes.

Agriculture is the backbone of the Irish Economy, It helped get the country back on its feet after the last recession (boom and burst!), it's the most indigenous industry Ireland has and the most resilient industry Ireland has. When Agriculture is doing well the country is doing well. Hence the need to ensure this CAP delivers for Family Farm viability.

This CAP Strategic Plan must support farmers in vulnerable sectors, especially farmers in suckler cow, beef and sheep farming. These sectors are already farming in an Environmentally friendly way as they farm, less intensively, in an environment in parts of the country where weather conditions, rain fall, soil quality, small farms, fragmented farms are all challenges to farming. There can be no limit or cap on the suckler cow herd.

Farmers have to get credit for the grass based system we have here in Ireland on our farms. You could say Ireland is Organic with our grass based system in comparison to farming in other parts of the world. Carbon Leakage makes no sense what's so ever. This is where subsidiarity needs to be optimised here in Ireland for the benefit of Farm Family Incomes.

The potential for real impact on farmers' incomes has never been so high. Farmers' incomes in certain vulnerable sectors are already in decline. Farmers are largely responsible for maintaining the country side. Farmer's livelihoods are being significantly changed at the moment. Rural Ireland will be left with Landlord Farms, a system we definitely do not want to return to.

I am asking you, DAFM, in the CAP Strategic Plan 2023-27 to support me on this journey and not to allow further pressure on our Farm Income and the viability of our Farm Business and to ensure Economic Viability for my Family Farm for the coming years.

[REDACTED]

Co Galway

From: [REDACTED]
To: [CAP Strategic Plan](#); [REDACTED]
Cc: [Stranooden GWS](#); [REDACTED]
Subject: From Stranooden Group Water Scheme
Date: Friday 3 September 2021 18:00:47

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To whom it may concern,

In Stranooden GWS we see first-hand, changes in agricultural practises and their impact. The expansion nationwide of dairy herds post quota, while bringing welcome prosperity to the countryside both directly and indirectly, has not however come without cost to our environment, pesticide levels, phosphate levels, Iron and manganese levels, sediment and coccidiostats and other pharmaceuticals used in animal medications have all increased in our raw water. Leaving aside the damage done to flora and fauna, to treat water to a standard where all these contaminants are removed will prove an extremely expensive process and ultimately these costs will end up coming from the pockets of the end user and taxpayer.

A much cheaper and environmentally beneficial way is to protect the raw water in the first place.

In recent times we are finding it more challenging to meet the standards set out by the relevant authorities, and as the suite of parameters increase and the allowable thresholds decrease, the task of producing safe wholesome potable water becomes more difficult and if the current demise of the quality of surface water continues, surface water drinking supply lakes will not be an option.

Stranooden Group Water Scheme (County Monaghan) is currently involved in a nationally recognised source protection pilot project, the first of its kind to implement a range of measures aimed at mitigating the impacts of contamination pressures. The focus is to improve the quality of the lake water pre-treatment. Over the past two years we have dealt with domestic, industrial and agricultural pressures and also pesticides from domestic, amenity and agricultural use. Without the goodwill of the community this project could not be successful. We set about a programme of sampling, fencing off watercourses from livestock entrance (12km), planting hedgerows to provide buffers preventing runoff (4km), extended willow buffer zones at critical source areas, providing a weed-wiping service to all farmers (100 farmers to date), along with servicing, calibrating and certifying boom sprayers and conducting a publicity campaign with the aim of highlighting water protection issues.

In our efforts to find solutions we are engaging with local communities, from farming and business. The solutions for these issues can be found at a local level, the right measure in the right place

The following suggestions are ideas that we think will make a real difference:

- All rivers and tributaries leading to a drinking water supply have an extended 40m buffer zone on both sides of the water body.
- Native hedgerow planted 5m from top of banks on both sides, providing shelter and shade for livestock, preventing soil erosion and help reduce agricultural runoff.
- 30m of agroforestry planted in the extended buffer zones with a stock proof fence protecting the plantation for 10 years or till trees are mature

enough to be robust for livestock.

- Along with appropriate infrastructure (trees & fencing) a payment package for farmers participating to be paid for 30 years @ €660 per ha (index linked to inflation).
- Contributions pursued and accepted from corporations that would offset their carbon emissions and take the need from the taxpayer to foot the whole bill, (currently there are opportunities for corporations to contribute with carbon tax credits given for one-off payment of €1000 per ha in similar schemes), the appetite from corporations with substantial bills for carbon emissions due, would enable much bigger contributions over the lifetime of the scheme.

Current “woodland for water” and “agroforestry schemes” are not attracting farmers on a large enough scale as the compensation for land is too small, we feel that a farmer that has land marching water bodies should be amply compensated. This scheme could be promoted and overseen by the local water supplier who would incorporate source protection front and centre, to preserve their drinking water supply.

This kind of initiative would satisfy 6 of the objectives for CAP Strategic Plan 2023 – 2027:

1. Support Farm Income.
2. Contribute to climate change mitigation.
3. Promote sustainable and efficient management of natural resources, water, soil, and air.
4. Contribute to the protection and enhancement of biodiversity.
5. Enhance ecosystem services.
6. Preserve habitats and landscapes.

Is mise le meas,



Stranooden GWS

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Draft Interventions for CAP Strategic Plan
Date: Friday 3 September 2021 12:15:32
Attachments: [REDACTED]

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Hi

See Attached file.

Regards

[REDACTED]

Sent from [Mail](#) for Windows

Tillage Farmer, Laois

The current proposals are going to do the opposite of what this CAP is aiming to achieve, such as Targeting the active farmer, aiding biodiversity and reducing climate change. My BPS has reduced roughly 30% in since 2013 and further cuts and going to really threaten the viability of the farm. I try very hard to work with the environment and am constantly looking for ways to reduce inorganic inputs and have maintain production and output. I have made a lot of progress in the last 8 years but what is being proposed under Convergence, CRISS and ECO-Schemes, have made me question what has it all been for. There is no reward or incentive for the good work that the tillage sector has done. Despite being by far the lowest emitter of CO₂ (in many cases, it sequesters carbon) and other GHG's and providing a positive impact for the environment and farmland birds, the tillage sector is taking the brunt of the cuts in the next CAP. What we are losing under these 3 proposals should be made up for under a targeted pillar 2 scheme specifically for tillage farmers.

- 1) Convergence. This will be the biggest threat to the future of the active farmer. The vast majority of farmers are relying on their BPS for the bulk of their income. At present, most farmers would be better off leasing out their land. This will happen further with convergence. More farmers will leave full time farming pushing more farmers into armchair farmers or part-time farmers whilst creating fewer, much larger farms. The tillage sector will be worst hit by this. Tillage farmers will be taking a further convergence hit under eco schemes as they will have contributed more and getting paid the same amount per hectare with more hoops to jump through. Maximum 85% convergence, but there also needs to be a way under Pillar 2 to target monies at the tillage sector to counteract the negative impact of convergence on tillage farms. A tillage specific scheme.
- 2) GAEC for tillage sector. This is a big worry for the sector as there is no value placed on work already done over the last 8 years. Tillage farmers had to do an eco scheme as part of greening for the last 8 years yet now that will be under a GAEC conditionality and have to be done to get even a BISS. Tillage sector is being further punished for making the improvements. It will push more land, particularly mixed farmers with a smaller area of spring barley, into monocrop grass. Adding to overall emissions. There needs to be flexibility from DAFM particularly under GEAC 8 and 9. If the measures can be left the same as currently under greening, it will be manageable. It must be acknowledge that Ireland is very different than continental Europe regarding tillage land. It is very small scale. We have limited markets for many crops and very difficult weather at harvest and planting times. A forced rotation would drive smaller and mixed farmers out of the sector. Will GEAC 9 be similar to EFA's?
- 3) Eco Scheme. Tillage farmers have been doing it for the last 8 years and there has been no reward. Just more hoops to jump through. It's going to be very difficult for tillage farmers. There needs to be more measures. It will be difficult to achieve 300 points while one whole section is specifically for animal welfare. On reducing nitrogen, we have reduced a lot over the last 8 years and there is no account for the Nitrogen efficiency of tillage crops. Tillage farmers should get a pass for eco scheme for what they are doing under GAEC or else a better list of options. If ECO schemes are going to be mandatory, it is important to get all farmers availing of them. If it is possible to link in some of the existing measures under

greening and under proposed GAEC's this could be achievable. A few other measures could be leaving hedgerows to be cut every 2-3 years, cover crops going in ahead of spring crops. There are always areas around each farmyard that are often overlooked from an environmentally beneficial aspect. While eco schemes are going to cost farmers money, they should be designed in a way to benefit farmers in other ways.

- 4) No mention of domestic feed. The suckler carbon and environment measure and dairy beef welfare measure have no requirements or promotion of domestic feed, despite its aim reducing emissions. This would be a low hanging fruit to achieve lower emissions from the beef and dairy sector.
- 5) There needs to be a tillage specific scheme under Pillar 2. Tillage will be the worst hit again. There will have to be some other scheme to reward tillage farmers for work done and being environmentally friendly. Follow on from GLAS, but not limited to €5,000, needs to be €10-15,000 to get achievable results for farmers. Linking in with environmental groups to see what actions would get good results.
- 6) Expanded coupled payments The protein payment and SIM have been hugely successful thus far. They are also helping to achieve our climate targets. An expansion of the protein payment scheme is needed and to include other crops such as OSR and combi-crops. The SIM needs to be a long term scheme to get results.
- 7) CRISS This will take money from active farmers and give to farmers that in many cases have their farms leased. Furthermore, this money will remain with the 'landowner' tax free. The active farmer gets punished.

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Submission.
Date: Friday 3 September 2021 18:38:16

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Submission from [REDACTED] on Ireland's Cap Strategic Plan
Pillar 1

In relation to a fair distribution of CAP payments, we should look at the overarching purpose of the funds. Since decoupling in 2003, the main purpose of the fund has been income support for farmers in return for compliance with environmental and animal welfare standards.

In this context there is no rational for not completing the convergence process and reach 100% convergence in this programming period. In 2027 it will be 24 years, almost a quarter of a century, since the decision was taken in the Fischer mid-term review to break the link between production, and what a farmer received. The Department's own data demonstrates clearly the despite massive difference in payment levels stocking rates do not vary significantly. Therefore I believe that we must complete the convergence process or risk undermining credibility in the entire system.

On Capping, there should be a top level set preferably at 60.000. Larger operations have economies of scale that the smaller farmer do not. This should not be seen as a controversial move; Caps exist in other areas of CAP supports. ANC payment are capped at 34 ha, and most other interventions whether they be in Pillar I or II have ceilings imposed on them. Crucially wherever a cap may be set at, there should be not labour or other offset allowed before capping kicks in. This will undermine the effectiveness and credibility of any proposed capping and make it meaningless in implementation.

Studies have shown that the redistributive payment is the most effective tool to support smaller holdings. I would be in favour of allocating up to of 20% of direct payments for the redistributive payment. It is vital that this measure is implemented fully, we should not be using a derogation to avoid doing this. Not only has this been shown to be the most effective tool to support smaller holdings, it can also act as an extra support for those farmers on high entitlements but with a small number of hectares that will be negatively affected by the convergence process. It is important the payment start from the first hectare of the holding. Without access to the exact figures, it is difficult to determine the appropriate ceiling but it should be considerably below the national average of 32 ha.

To give farmers certainty we should aim for 25% of direct payments to be allocated to the ECO Schemes from the outset. We should not look to avail of derogation or "learning periods" to this. It is important here that the scheme is designed in a manner that ensures that the funds can be drawn down by the farmer without

costs being incurred. The Eco Schemes are an important component of the new CAP, however their implementation should not result in a reduced payment to the beneficiary. The schemes must be made available to all sectors and enterprises with equal access to the fund for all applicants.

The production of Hemp for medicinal purposes should be dealt with in this plan. Never has there been such interest in the crop. There has been an explosion in the production of CBD based products on our supermarkets and pharmacies. There are massive opportunities there for farmers. Given the nature of the plant there are also opportunities for the environment too. From medicine to fuel to food Hemp is something that Ireland needs to take the lead in when it comes to production within the European Union. The changes in this regulation allowing for up to 0.3% THC allows European farmers the opportunity to operate on the same level playing field as other parts of the world. We should take advantage of this.

Pillar II

It is important that in designing AECM measures that they are inclusive and give opportunities for all landholders to participate. In the previous reform under GLAS the priority asset ranking system effectively excluded some farmers. This should not happen again, all farmers on all types of land should have equal access to the scheme. Priority can then be given to those that are willing to do more and go the extra mile for the environment. It is important that existing good practice be recognized and supported.

It is disappointing in the proposal that the concept of Paludiculture is not mentioned. This is important, if we are serious about rewetting we must engage with this type of agriculture. Rewetting without encouraging Paludiculture will be seen as land abandonment by most and there will only be reluctant minimalist engagement by landowners. Equally so Agroforestry, while mentioned, is not given the priority it deserves. Agroforestry systems have many benefits particularly suited to many farms in Ireland given our prevalence of grassland, that should be exploited and promoted in a much more proactive manner.

The Suckler Carbon Efficiency program is a measure that must be revisited by the department. In its current form it is unacceptable. It is difficult to understand the rationale of the Department for the introduction of this blunt instrument. Restricting expansion without any reference to existing stocking rate per hectare is not a credible manner to proceed. Many suckler farmers operate low intensity extensive grazing systems that require fluctuating stocking rates to maintain the landscape. Requiring these farmers to restrict their numbers is counterproductive and runs counter to commitments given in this plan to support extensive grazing systems. The suckler sector is of vital importance to many peripheral areas of Ireland without which there would be little other agricultural activity. This sector is entitled to proper support that recognizes its important role in the economic, environmental and social fabric of much of rural Ireland.

There can be no doubt that Ireland does indeed need to reduce its livestock numbers. It is delusional to think otherwise. This reduction should however be

achieved by targeting the dairy sector. A sector that doesn't come close to being as environmentally friendly as suckler farming. A sector that requires derogations from the nitrates directive to facilitate its activities. Reduction in this sector should be achieved by targeting those with the highest stocking rates as opposed to dairy farmers who farm extensively in a far more sustainable manner. Extensive over intensive. At a time when animal welfare is becoming increasingly important to consumers it would be folly for our country to shut down the suckler beef sector to make way for dairy beef and the pipe dream of never ending dairy expansion.

Across all aspects of the plan, all farmers are entitled to equal support. The burden of reducing our agricultural emission must be shared equally, with emission tackled at source and farmers supported to reduce these. It is worrying that reductions in emissions in the land use sector, are to be used to offset emission in the agricultural sector rather than requiring each sector to account for its own emissions. This goes against the concept of a "just transition" and is not acceptable.

Sent from my iPad

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: CAP Strategic Plan
Date: Saturday 4 September 2021 23:13:21
Attachments: [Kingdom Genetics Business Idea.docx](#)

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[REDACTED]
Firstly I would like to thank you for the opportunity to contribute to the debate on what shape the future CAP should take. I do not envy your job as you try to please farmers, environmentalists and many other sub groups with often very opposing agendas.

It is often in times of crisis that the best solutions are found and I have no doubt that Irish Agriculture will continue to grow and become more efficient despite current difficulties. There are winners and losers in all decisions making it difficult to choose the best road forward.

There are a number of technologies that if developed I believe could deliver in terms of allowing our production base to develop and yet still deliver environmental gains. Sexed semen is one in question and I was very happy to see it being supported. It allows us to potentially almost eliminate the production of dairy breed bull calves replacing them with better quality beef crossbreeds. Apart from the benefits of better beef genetics leading to more efficient beef production there are also some not so obvious benefits that include

- Potential for greater selection on the dam side due to fewer cows needed to breed the next generation of replacements resulting in faster genetic gain of replacement heifers.
- Reduced risk of welfare issues associated with low value dairy bull calves both on farms and in transport to overseas markets.

While there are some challenges with sexed semen relating to cost and conception rates I think they should not hinder sexed semen becoming the industry norm in Irish dairy herds in the future.

A follow on from this could be the use of commercial beef embryos. I did some work on this in 2012 but was unsuccessful for a number of reasons. It may be time to examine this again. If early maturing male sexed embryos in particular could be produced at a reasonable cost, achieve reasonable pregnancy rates in dairy cows and be finished in a young bull intensive operation, they could substantially outperform dairy beef cross animals. This would also be a far more efficient means of beef production than beef coming from the suckler herd as we do not have to maintain a cow for the year. It would allow our dairy herd to continue to expand without having a negative effect on our beef industry. I enclose a copy of the plan for kingdom Genetics from 2011 for reference. There have since been some developments in the area of embryo transfer that would be of benefit.

Methane is a valuable fuel and if it were possible to recover some of this through modified ventilation systems in animal housing we could not only reduce emissions but have a renewable fuel source that could be used to service times of peak electricity demand in effect killing two birds with the one stone. I think this avenue should be explored as well as trying to reduce methane emissions.

Thanks again for the opportunity to contribute. While it is not going to be possible to please everybody, one can at least have the satisfaction of having the

opportunity to be heard.

I wish you every success in this endeavor and look forward to learning of the outcome.



Kingdom Genetics business idea

Kingdom Genetics is a new start up Animal Breeding Company focused on capitalising on a particular niche market opening because of the increasing use of sexed semen into the dairy breeding herd. Kingdom Genetics strives to be a key player in the production, marketing and supply of sexed commercial beef embryos.

Sexed semen while still costly, is gaining in popularity due to a reduction in price and better conception rates. In the future we will be able to use 100% sexed semen through AI (Artificial Insemination) in the dairy herd. This will allow us to progress towards the elimination of the vast majority of dairy breed male calves not required for breeding. These surplus bull calves from dams and sires selected for extreme milk production will never be ideal specimens for beef production regardless of the system of rearing.

If we assume a 25% replacement rate annually for the dairy herd we will move progressively towards a larger portion, potentially 75% of our dairy cows that can be crossed to beef bulls with the progeny used for beef production. The first cross to a beef terminal sire from extreme dairy breeds however are still only average suitability as a producer of beef.

Embryo transfer techniques allow us to produce top quality beef breed calves from the 75% of the dairy herd surplus needed for dairy replacement stock. Kingdom Genetics is assessing how to capitalise on this opportunity.

Angus bull embryos have been chosen for entry to the market for a number of reasons. There is a large gene pool world wide of Angus cattle allowing for more rigorous selection of the genetic traits we are interested in. Angus have already a reputation of being an easy calving beef breed. They are early maturing and can be finished for a 16 month bull beef market. Angus cattle also attract a premium price for their superior beef quality.

Kingdom Genetics has set a target of being able to produce Angus bull embryos that when carried in Friesian dairy cows will have a 10 day shorter gestation length, a 20% reduction in birth weight and a 30% greater carcass value than Friesian bull calves. To achieve this Kingdom Genetics will contract embryo production to large scale heifer beef operations. These farmers will most likely be outside Ireland due to necessary scale and reduced cost of embryo production but will use sires already tried and tested in Irish production systems. Information relating to the performance of embryos in terms of birth parameters and carcass value will be fed back into the selection process for the next generation of heifer donors. With a genetic interval of two years, a 10% selection rate for breeding the next generation of heifers and a large genetic population of Angus cattle it should be possible to make good improvements in the traits of interest in the medium term. In the longer term it is hoped to produce a similar

strain of Belgian Blues and produce an Angus Blue cross bull with acceptable calving characteristics but with superior carcass value than a pure Angus bull.

Who benefits?

Dairy Farmers When used in combination with sexed semen, farmers can replace dairy breed bull calves with an estimated value of €100 with pure beef bull calves with an estimated value of €350. Cows with shorter gestation lengths and producing calves of lower birth weights will also have increased milk yields due to a longer lactation period, reduced calving difficulties, greater body reserves at calving and greater submission rates for the next breeding season.

Beef Farmers Beef farmers will have a new supply source of calves capable of achieving efficient feed conversion when raised as bulls. In the long term it should be possible to produce embryo bred calves from the dairy herd capable of competing with animals coming from the suckler cow herd. This would allow a much more efficient method of beef production than we have currently where over 50% of our cost of production relates to the maintenance of the suckler cow with no net production of beef.

Beef processors With the abolition of milk quotas and a shift away from intensive beef production to more profitable dairying, a new stream of quality beef animals would be most welcome to our beef processors. With a focused breeding programme we can more easily target the traits necessary to add carcass value while maintaining the calving ease requirements of dairy farmers. We can also respond faster to changes in the market place than is currently the case.

Challenges

Method of embryo production In vitro production where eggs are collected from the ovaries of donor heifers and fertilised in vitro is the cheapest form of embryo production. A difficulty relating to large calf syndrome was encountered in the past with in vitro embryos. It may be that this was mostly attributable to having little control over the genetics of the heifer donor population and may not be a problem in a controlled breeding donor herd. In Vivo embryo production where embryos are collected from live animals may still be feasible in a large herd situation and in a location where fertility hormones and embryo transfer services are reasonable priced.

Cost Farmers must reap a significant financial gain to uptake this new technology. It is estimated that the price delivered to the farmer would need to be in the region of €50 per embryo straw to be attractive. Kingdom Genetics would need to make a 30% margin over production costs to be a viable commercial operation.

Consistent pregnancy rates To have a viable pregnancy we need fertilisation of the egg and implantation of the embryo to the uterine wall. With fertilisation already achieved in embryo transfer we should be able to achieve higher pregnancy rates than from using AI. There is some inconsistency in achievable pregnancy rates from embryo transfer and some work is needed on methodology to ensure consistent repeatable results.

Resources Kingdom Genetics will require backing in terms of financial resources and technical expertise from major players in the beef industry to bring this development to a commercial reality. I believe that this idea if properly researched, resourced and taken to market has the potential to play a significant role in the growth and development of the Irish Dairy sector.

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: CAP Submission
Date: Thursday 2 September 2021 14:31:39

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To whom it may concern,

I am writing this submission as an Agriculture Consultant.

My main observations in this submission will relate to Pillar II.

I am worried about the administration of these raft of Pillar II proposals. Whatever comes in should be kept as simplistic as possible and not overly onerous with red tape otherwise all will drown in paper and administration.

From my contact with past Results based schemes including locally led EIP projects I find that the annual one on one contact with farmers is good regarding discussing farm improvements/ efficiencies. I think the most effective form of Knowledge Transfer is one on one with farmers on their own farm own farm where Pillar II objectives can be discussed and topics such as biodiversity/climate change-carbon efficiencies on farm/ water quality-nutrient management-farmyard management, etc can be discussed on farm with upskilled advisor. This would empower the farmer with good information specific to own farm to make necessary improvements to meet agri-environmental targets with optimum agri environmental grants assistance/ TAMS/ other DAFM schemes/EIP projects/ SEAI grants, etc.

Farmers are good adapters and keen to embrace best advice.

From my own advisory point of view everything has become too timetabled with short windows for applications rushed on top of other scheme deadlines. This creates nothing but stress and rushed advice to farmers. I will touch on some of the schemes. I would like a commitment that all advisors are emailed notifying of launch of all schemes besides sometimes relying on notification in the farming press. Also that a likely time frame for launching of schemes is communicated annually in good time to advisors with the hope that this information can be relayed with some degree of confidence in advance to farmers. Tight windows for doing work at a time of year already loaded with advisory work should be avoided.

Maybe the BPS application period could be opened up earlier - why can't it be opened up in January. Also why can't the Nitrates Derogation application period open up in January. This would possibly free up time to give a better quality Pillar II schemes service.

- Agri Environment Scheme. Proper training of advisors needed well in advance of opening of schemes so advisors can communicate with clients and not in a rushed- panic-deadline round the corner setting. If such schemes are to be on a field results basis this will create serious pressure on time with eg biodiversity field management results such as REAP only really achievable May to August so efficiency will be key with proper tools available to advisors. If any work can be done in an off season setting then an allowance should be made to do so. In that regard, opening of such schemes in the off season would give advisors and farmers good time to properly converse.

Maybe a facility for farmers to do a simple level of self inspection confirming status in the year(s) following initial consultation on farm with an advisor through geotag AgriSnap or other means would create a degree of efficiency for all.

- Agri Environment training - maybe one on one with farmer? as doing a plan for any agri environment scheme. Could be done off specific template discussing issues, detailing help

available in delivering solutions and giving plan to farmer. Maybe go a step further and do a workshop setting on the host farm of one of the farmers. If the mind understands, the heart follows and reward farmer in pocket for what the public (CAP) seeks to deliver.

- Organic Farming Scheme. We lag way behind European averages for % of organic farmers. In my opinion this is not helped one bit by launching OFS sporadically (last launch in the middle of BPS period). This is giving advisors and as a result farmers absolutely no chance of getting good quality advisory/planning services. I highly recommend that OFS is opened on a year round basis or at the very least there is some certainty given to relaunching of OFS annually by a certain date so that advisors can concretely advise clients about this and fully advise with farm visit at time of year when they aren't rushed off their feet. Recommend higher level of OFS payments and look again at double funding with GLAS area based measures (whereby OFS payment is foregone for these areas) which is stopping a lot of farmers from converting to organic farming. Also i find it amazing that we have this green image and are not a heavily industrialised country but we can't seem to market our organic produce better abroad. Is there room for improvement here? Is organic being advertised as top of the pile with our 'Origin Green' produce? Is there scope for better marketing grants to drive organic.

- European Innovation Partnership Operational Groups - i have concerns very similar to Agri Environmental Schemes in this regard. If there is to be a far greater number of these than is presently there then there is a need to upskill advisors well in advance of any schemes so that they can educate and inform their clients well in advance as advisors are best placed knowing their clients farms. Again advisors need access to efficient tools (scoring Apps) and be able to vastly reduce the paper mountain for all. I think there is a need for an efficient means of giving feedback to farmer in an efficient and timely manner that confirms and follows on from on field advice.

Finally there is a lot talk about environment etc. Eco-Schemes are designed to protect the environment. The safety environment and isolating environment that some farmers find themselves working in can be very challenging. It is well advertised that the farm work environment is the most dangerous of all. Would it not be an idea to have a 'health and safety' action in ecoschemes. Also mental well being is very important for farmers especially considering how isolating and challenging farming can be for some. Could 'well being' be an action in eco schemes. At least if this was a main stream option some farmers may not feel the perceived 'stigma' in asking for help. Could be something as simple as attending talks offering guidance how to mind themselves and their well being through good habits, time management and making time for certain things besides the farm. Some can't see a life solution looking inside out from bubble but a bit of gentle advice from the outside could help a lot. Also points of contact for guidance could be communicated. It is very important to remember that the farmer is the glue holding the environment in good stead and they have to be minded too. Please give consideration to this. Also if upskilling advisors i think it wouldn't be any harm if advisors got some basic training outlining help/resources and guidance to pass onto their clients about their well being.

I do not have any objection to my name being published.

Best Regards,
Martin Mulvihill
Agriculture Consultant


Regarding
Submission on CAP
Strategic Plan

I am writing concerning The CAP Strategic Plan
I believe that the 85% Convergence should significantly
increase by double or more. The Annual entitlement
to Low income Small to medium Farmers
Large Scale Farming enterprise with Large entitlements
will need to be reduced to achieve this aim.
Agricultural Farmers who do not work the
land only leasing the land should be either cut
significantly or lose their entitlements.
Their entitlements should go towards progressive
productive innovative and environmentally aware
Small to medium sized Farmers Both Full and
Part Time.

Concerning The environmental Grants, one has to be in
tune with the economic reality of the present.
In the 1990s the Rural environmental Scheme
(REPS) was 5000 Irish Punt ~~For a Farm~~
The A.E.O.S and GLAS Schemes were nowhere
near that payment rate. The cost of Farm
maintenance has risen considerably in the past
30 years but not the environmental Grants.
A payment of 8000 + Euros would be annually
would be a realistic step forward it would be
more in line with the current economic climate.
Also Natural areas like peat scrubland, old Quarnes

And other Areas of a Farm that cannot be Utilised For Agricultural purposes should be included in the current Agri environmental Scheme

We need To move Towards a self sufficient Country that will produce all our needs and more with a Realistic price (a bigger share of the overall price) and the opening of markets without interference

Farming needs to Return as a realistic Option For young people with protections From Bankers and Outlets

Also it would be a positive move to Bring Back the Land Commissions Thus allowing young progressive Farmers to avail of land Beside them and pay a rate Thus ending all large estates being bought up by multi millionaires

I hope these points made are Useful.

Thank you



CAP Rural Development Division,
Agriculture House,
Kildare Street,
D02 WK12

3rd September 2021

To whom it may concern,

Dairymaster is a world leading innovator of hi-tech dairy equipment, and we are passionate about making dairy farming more profitable, enjoyable and sustainable. We are extremely concerned at the potential exclusion of dairy equipment from the on-farm capital investment scheme under Ireland's CAP Strategic Plan 2023-2027. In our opinion removing supports for the modernisation of dairy farming especially at this time would be both short-sighted and counterproductive.

We believe it is important that the continued investment in the modernisation of the Irish Dairy Industry is supported to meet the objectives and challenges which are set out in the CAP Strategic Plan 2023-2027 and ensuring that the Irish dairy industry can play its part in mitigating climate change, further developing milk quality and food sustainability, continued improvement in farm safety and promoting rural social sustainability.

A natural expansion of dairy output in Ireland was driven by the removal of the milk quota in 2015. However, while milk output has increased, CSO figures show that the total number of cattle in the country has actually decreased year-on-year since 2017.

The Targeted Agriculture Modernisation Scheme, which was originally developed to modernise Irish dairy farming, has encouraged investment to drive efficiency and productivity at farm level, enhance milk quality and animal welfare, and make farms safer places to work.

Studies by Teagasc (and others) show the benefit of increased dairy productivity on lowering carbon footprint. We see other countries investing heavily in development of dairy farming, with concentrated feeding operations that produce milk with a much higher carbon footprint than is achieved by Irish farms. A failure to continue support for the modernisation of Irish dairy farms will lead to a loss in international competitiveness and to milk production being moved to other regions. The net result will be increased carbon leakage and a negative impact for the global environment.

We strongly believe agriculture remains the key driver within rural communities across the country. One of the key challenges facing the industry at farm level is the shortage of skilled labour and the difficulty in attracting younger generations into the industry. At present, there is a clear lack of labour availability on Irish dairy farms, and without

[Redacted]



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supports to modernise this trend will only worsen. Having an adequate number of milking units is pivotal in encouraging efficiency on farms by reducing milking times, reducing labour and ensuring a better work/family life balance. Technology and modern equipment also reduces the physical burden of daily tasks on the farm, making dairy farming a more attractive career. In Ireland only 12% of farmers are female, significantly lower than the European average, and there is an opportunity to correct this imbalance.

The annual electricity demand for milk cooling on Irish farms is approximately 100,000 MWhr. The TAMS schemes have been instrumental in improving the efficiency of milk cooling on dairy farms, however the vast majority of milk cooling tanks in the country are still working on older refrigerants such as R404a/R507 which have a high Global Warming Potential (GWP). There is a continued need to promote and facilitate the upgrade of these to lower GWP systems. Thermal energy storage technologies, which up to now have not been commonly used, are available to facilitate greater use of renewal energy on farms.

Farming can be a challenging occupation; stress factors include but are not limited to isolation, time pressure, financial strain, long working hours, adverse working conditions and more. Supporting investment in modern milking parlours and automation for cattle handling can greatly reduce these stresses as well as reducing the workload and farmer fatigue.

The Draft Needs Assessment highlights the need to continue improving animal health and welfare standards and increasing awareness of antimicrobial (AMR) and anthelmintic resistance. Modern milking systems with specialised technology are designed to improve milking hygiene. These systems are of great assistance to farmers fighting against the spread of contagious mastitis. Great progress has been made to date on many farms, however exclusion of the dairy equipment grant aid will put this progress in jeopardy by encouraging the installation of out-dated secondhand equipment, increasing the risks to milk quality and farm safety.

Supporting precision feeding technologies to monitor feed intake by animals and tailor it to their specific requirements will result in better animal welfare, herd health and farm productivity. The farm can also maximise the herd fertility and conception rates, further improving the carbon footprint for the herd. Where technology is used efficiently, the farm can see a reduction in feed usage and an increase in milk yields. Feeding the right amounts to the right cows is key for optimal performance and keeping cows healthy and more fertile.

It is essential that Ireland's international competitiveness and reputation is protected. We must continue to be known for producing the best dairy products in the world by enhancing sustainability, traceability and safety. Continued investment in modern dairy equipment must continue to allow for better animal welfare, better hygiene and quality standards on farm.

Significant investment is required to develop economic and environmentally sustainable farms. The grant supports have enabled more farms to make this investment, where



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otherwise they would have either ceased farming or continued with sub-standard practices and out-dated equipment.

The Irish dairy industry has shown that it can respond to national policy such as was achieved with Food Harvest 2020. Continued support for our dairy farmers to modernise and meet the challenges now facing us is critical to ensure that we can continue to provide sustainable, traceable, high quality dairy produce for generations to come.

Yours sincerely,



CAP consultation document

Submission by [REDACTED]

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

[REDACTED], 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, [REDACTED] 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.

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.

		Yes	Don't know	No	
1	<p>A suckler cow variable premium worth about €120/cow calved in addition to BDGP/BEEP type scheme.</p> <p><i>Cost: 9.6% deduction from everybody's per hectare payment (eg €24/ha from a payment which would otherwise be €250)</i></p>				
2	<p>A ewe variable coupled premium worth about €16/ewe in addition to sheep welfare scheme.</p> <p><i>Cost: 3.4% deduction from everybody's per hectare payment (eg €8.50/ha from a payment which would otherwise be €250)</i></p>				
3	<p>Beef feeder carbon efficiency payment worth up to €120/ head for feeding animals between 12-24 months. Payment requires weighing twice, dung sampling and one day training.</p> <p>Final payment is a voluntary payment for animals early finishing of animals (€40 for u24 months-heifers, steers, €30 for u 27 months; €40 for bulls u16 months; €30 for bulls under 24 months). Animals can be suckler or dairy born but not female dairy breeds. Animals must be held by participating farmer for 12 months, unless slaughtered earlier. (eg Buy animal at 6 months, can't be sold before 18 months unless slaughtered)</p> <p><i>Cost: 10% deduction from everybody's per hectare payment (eg €25/ha from payment which would otherwise be €250/ha)</i></p>				
4	<p>An early retirement scheme for suckler farmers (over 55 years of age) which would pay €100/cow for 5 years to stay out of breeding systems (dairying or suckling) and which would have to be joined in year 1 (ie 2023) combined with a 25% young farmer top-up on per hectare BISS payment and variable suckler and sheep premia.</p> <p>Grazing cattle would still be permitted.</p> <p><i>Cost: €5 million less in TAMS – possible limitations on entry into TAMS. Young farmer top-up from 3% young farmer fund.</i></p>				
5	<p>Agri Environment scheme worth up to €15,000 per farm.</p> <p><i>Cost: €400 million if the average payment is €10,000 and the scheme is restricted to 40,000 farmers</i></p> <p><i>– it means competition to get in, it means targeted at those who will do the most and it requires government to deliver €150 million extra from carbon taxes as promised in the programme for government.</i></p>				

DEAR SIR/MADAM,

REGARDING THE PUBLIC

CONSULTATION ON THE 2023-2027 CAP PLAN.

I BELIEVE THAT ANY FARMER WHO IS RECEIVING A SINGLE FARM PAYMENT OF BELOW €12,000 EURO PER YEAR, SHOULD RECEIVE AN INCREASE IN THEIR S.F.P.

I ALSO BELIEVE THAT FARMERS WHO ARE IN FARM PARTNERSHIPS SHOULD HAVE THEIR SINGLE FARM PAYMENT PAID TO EACH FARMER INDIVIDUALLY, LIKE IT WAS DONE BEFORE THEY JOINED THE PARTNERSHIP. THIS SHOULD BE BROUGHT IN FOR THE YEAR 2021.

I WOULD ASK THE DEPT TO WRITE TO EACH FARMER AND INFORM THEM HOW MUCH THEY WILL RECEIVE IN THEIR S.F.P. ~~AND~~ THAT STARTS IN 2023.

THEY WILL CUT DOWN ON STRESS AND ANXIETY THAT THIS WHOLE PROCESS IS CAUSING FARMERS.

THANK YOU VERY MUCH FOR READING MY SUBMISSION

Ireland's CAP Strategic Plan 2023-2027 - Public Consultation on Proposed Interventions

Submission by [REDACTED]
[REDACTED]
[REDACTED]

1... Old Farmers: Many frail old farmers are continuing to farm just to cling on to their EU farm payment. Many of these farmers suffer injury and death in farm accidents.

Proposal: Introduce an EU farm payment severance pension, of say up to 10 years or remaining life span, for farmers over 75, which would allow the farmer to lease or sell the land without entitlements passing to 3rd parties while the farmer would keep the farm payment as a severance '**pension**'. This could be modified to a shared scheme with relatives if desired. In my opinion many Dairy Farmers would gladly rent such adjoining lands without needing the 'Farm-Payment'.

2... Manure storage: In my experience lack of adequate manure and soiled water storage of all types on farmyards is directly and indirectly the main cause of nutrient loss from farms:

1. By actual leakage from the farmyard and

2. By causing manures and high organic liquids to be spread on lands with unsuitable wet surfaces

- such spreading leads to nutrient rich surfaces and importantly organic seals which encourages more than normal overland runoff

Based on my knowledge of Irish soils and soil mechanics I put a lot of development work into constructing low cost earthen storage tanks for liquid manures. The original first tank was at [REDACTED] for [REDACTED] in the early 1990's. I repeated this work later at [REDACTED] for [REDACTED], where I developed a protocol for a wider selection of sites. The second tank at [REDACTED] and 2-tanks at [REDACTED] are still in use without any problems.

With [REDACTED], I supervised [REDACTED] who did a PhD on the appropriateness of these vessels for manure storage. All this work was published. There were about 200 tanks built by farmers that I am aware of, most following our protocol.

[REDACTED] tested about 50 of those tanks constructed on private farms in recent times in the [REDACTED]. Not one had a problem with leakage or had any other environmental problem. In fact the only problem ever encountered ([REDACTED]) was where a plastic rainwater pipeline was left embedded in the bank, which of course was against our protocol. We were aware of this potential problem from the beginning, but we took the word of a digger operator that it had been removed on a particular farm. We learned a lesson on essential supervision at construction time, after that incident.

The essential fact is that it is a relatively easy task to ensure a safe clay seal and we have all the specifications for doing that. The only small change I would make to the older specification is for the gradient of the embankments to be 1/2 or less instead of a gradient of 2/3 or less as we had at the beginning.

Earthen Lined Storage Tanks or EBTs as we called them have a number of advantages;

- If our protocols are followed fully they can be guaranteed to be leak proof. [REDACTED]

[REDACTED] measured hydraulic conductivities [permeability to 'water']

clay clay-seals at less than 4×10^{-10} m/s

[or less than about 1/2 inch per year].

Further when used, even the most dilute slurry will fully

seal that low value, to give a virtual hydraulic conductivity of zero for tanks in use.

- The construction on 90% of sites is low cost and straightforward, making it economic to construct appropriate sized tanks for all liquid manures, manure-pit and silage pit effluents, dirty-yard-runoff and dairy parlour washings; all combined into the one tank.

- **Adequate winter and wet weather storage in one tank has many advantages:**

- Completely eliminates spreading of manures, dirty yard runoff and dairy washings when weather conditions not suitable which include:
 1. for deep soils when the soil surface is a.. **waterlogged** and b .. **saturated**
 2. for karst and other ground-water 'N' vulnerable areas [e.g. shallow well drained soils over very permeable subsoil and bedrock geology], when total soil profile water content approaches or exceeds '**field capacity**'.

NOTE: the important difference between '**waterlogged**', '**saturated**' and '**field capacity**' is very

important.

Waterlogged: a condition of the surface soil when all pores are saturated with water but more;

there is no useful downward hydraulic gradient present - there is effectively a water-table at the surface, be it groundwater table or a perched water-table. Waterlogging is essential for overland-flow-runoff to take place. It is common on poorly drained soils

Saturated: a condition when all soil pores are full with water but the soil may still have adequate infiltration capacity for a limited quantity of liquid over a limited time because there is still some adequate downward hydraulic gradient capable of taking rain or irrigated liquids from the surface without overland-flow run-off taking place. In this situation, the water-table is not at the surface but lower down the soil profile. The 'saturation' can be seen as capillary rise coming to the surface due to a very fine pored soil usually derived from alluvium or loess.

Field capacity: this is the natural water content of the soil profile after rain and where free drainage has occurred but no solar drying [evapotranspiration] has taken place; in this condition water leaves the bottom of the soil profile soon after liquid is added to the surface. A soil moisture deficit by solar drying is required to avoid this water loss at the bottom.

On Nitrate Vulnerable Soil: Failure to understand and act on these phenomena is, I believe, the main cause of high nitrates in groundwater.

In my view. **such elevated high nitrates have in fact little to do with moderately elevated stocking**

rates per say or indeed with nitrate fertiliser applications within reasonable rates. As is already

well known applying nitrogen on such vulnerable soils when crops are not actively growing and taking

up nitrogen is one factor but applying dirty water in quantities in excess of about 5mm irrigation at the

one time when soil water contents are near or exceed field

capacity. on such soils is also a significant

factor. Applying liquids up to about 6-7 mm of irrigation is safe when soil moisture deficits exceed

about 20 mm or more. and when excessive heavy rains are not forecast capable of obliterating those

deficits Light rain with a good soil moisture deficit at the time of irrigation is always an advantage

because **it helps to** wash in any fertiliser or solids deposited on the grass or other crop, as well as absorbing

ammonia from the air and preventing further ammonia losses from the washed in liquid. Similar rules

apply for slurry/manure spreading

On Other Soils not nitrate-vulnerable but vulnerable to nutrient overland-runoff: Knowing the risk

here, is knowing when the soils are waterlogged or likely to be waterlogged. Other than that all soils

should have a minimum soil moisture deficit of about 20 mm at time of spreading fertiliser, applying slurry/manures or dirty waters. Again light rain is an advantage at the time of spreading or application but if very heavy rains capable of obliterating the soil moisture deficit is forecast it is better to wait a few days until the rain has passed **and** a new deficit has developed.

- **Mixing liquid manure (slurry) with yard runoff, silage effluent and wash waters has many advantages:**
 - Dilute slurry gives much better returns on Nitrogen. **Refs:** see work by Andy Steward [NI-DoAgr] about 40 years ago and Hugh Tunney [JohnstownCastle] about 20 years ago. Dilution with an equal volume of water (soiled etc) is advantageous and saves on ammonia loss.
 - It avoids all the problems of spreading soiled and wash waters and silage effluents separately.

- acid silage effluent will stabilise some ammonia as non-volatile ammonium lactate.
- **In summary** Earthen lined slurry stores can eliminate all nutrient losses to surface waters and nitrate losses to groundwaters overnight. They can also be a part of a study that will show nutrient losses from farms have nothing to do with reasonable fertiliser application rates or stocking rates up to a cow per acre, but more to do with lack of farmyard storage and of course downright carelessness and spreading at the wrong time of the season.

Proposal: Ask Teagasc to verify the facts outlined above - if necessary by a small amount of commissioned experimental research. An educational programme designed to help farmers implement the findings would also be necessary. Teagasc already has the soil expertise to help farmers and contractors to construct these

liquid manure and dirty water storage tanks but they would need a trained technical assistant for every 3-average counties in the midlands, south and east of the country and about one such person per about 5-counties in the west and north of the country; about 6 in all. On issues of 'waterlogging' 'saturation' and 'field capacity'

there is an education job to be done by all concerned. I am available on a phone call to explain any issues further if necessary.

On the issue of inadequate manure and soiled water storage and farm yard leaks it should be a condition of receiving farm payments that the farmer's planner should inspect the farmyard every year to make the farmer aware of storage requirement deficiencies, farmyard leaks and other environmental issues in the farmyard.

A plan to rectify should be made available to the farmer with a 3-yr time slot to implement.. This would be

very beneficial to farmers who dread visits from local authority inspectors.

3... Land Drainage: From the discussion above on the role

overland flow runoff plays in surface nutrient

loss to surface waters it is obvious that wet surfaces due to poor drainage can be a cause of nutrient loss. In most cases such wet surfaces can be eliminated by properly designed land drainage. Such drainage will reduce water-tables below active root zone and eliminate surface lying water (waterlogging) and thus eliminate overland-flow

run-off and thus surface nutrient loss. Environmentalists often claim drainage water will still remove the same amount of nutrient. This is patent nonsense and obviously not the case if the drainage system is properly designed and the water-table is below active root depth. So instead of all those useless studies on run-off pathways such efforts would be better focused on eliminating the pathways with intelligently installed drainage.

Proposal: Some CAP monies should be diverted to verifying these claims and subsidising land drainage for good environmental reasons

4... Good use of Pillar-II monies: Down the years, I have seen a lot of monies spent on environmental schemes designed by urbanites that leave no lasting value to the environment or to bio-diversity. Set aside for a few years for example or planting flowering plant crops for a few years and then when the scheme comes to an end neither the birds nor the bees are left with any permanent source of food. I propose the following schemes with more long lasting effects.

1. **Hedgerows for firewood to replace fossil fuels:** I am aware of ongoing work to get hedge-rows on Irish farms recognised for carbon sequestration but what I am proposing is an extra; By planting hedge-rows with tree species suitable for fuel, such a scheme could lead to the development of local rural enterprises:- i.e. planting, caring, and harvesting such plantations for fuel. It could replace the rural tradition where some families cut turf for winter fuel. I know from my experience with the BnM 'biomass' willow plantations of the late 1970s that planting a crop for fuel as a commercial farm crop to compete with fossil fuels, is not possible. Coal and similar calorific value solid fuels can be bought in bulk for about €60 a ton whereas it costs €160 a dry ton at least, to grow any farm

crop for fuel. Further; wood and woody products have only half the calorific value of good coal, making them more than 5-fold more expensive on a unit of energy basis. But planting on hedge-rows where the land owner may get some environmental credit and where the business may be supported by Pillar-II subsidies and where families may volunteer their time with harvesting is a different matter.

2. **Hedgerows for trees in lieu of forestry:** There are 600 000 km of hedge rows according to Stuart Green Teagasc in the country [ROI]. There is potential here for a scheme for planting hedge-rows with suitable species in lieu of acquiring farmland for planting forestry. Forest plantations would have extra demands on labour for annual pruning leader growth training, Because tall trees in a short grassland pasture environment capture much more solar radiation than just what would be captured by the equivalent base area of the tree plantation, the credited area would have to take this into account. It is a straightforward calculation for a meteorologist/plant physiologist to do this calculation. The "equivalent forest area" would be 2- 3 times that of the hedge-row width multiplied by the length of the planted hedge-row. NOTE: Grass photosynthesis may be reduced somewhat during early morning and late afternoon long shadow periods but more intense mid-day solar radiation may be intense enough for scattered diffuse radiation to give maximum growth to both trees and grass. Competent plant physiologists will know how to calculate the real figures for the different times of the day and the different times of the year for trees at various stages of growth. If only 5-m in width were allowed for planted hedgerows that would be 5m X 600,000 km = 300,000 ha a significant potential forest area. Further mature trees may command a 10 m width which would be the equivalent 600,000 ha of tree plantations !!! .
3. **Hedgerows for flowering and fruiting trees and shrubs to aid wildlife and biodiversity:** The aim here is the same as above; to use passive hedge-rows just sitting there, as farmers see them, put to an extra good use; all without buying or acquiring an extra square meter of land.
4. **Bridle paths and Hiker-trails for riders and walkers - Rural Greenways :** Along certain routes these could provide amenities to encourage urban dwellers to visit the countryside, Encourage the development of hotels, restaurants and pubs where such trails exist. In the case of bridle paths they would encourage riding-schools and livery-yards to make horses for day-hire available thus promoting an environmental and climate friendly tourist business. In some cases the bridal-paths could be very useful to hunting packs where access to the countryside around relatively more intense farms e.g. dairy farms, is becoming more difficult.

Finally there is no reason why some farms could not use a selection of all the above schemes on their hedge-rows. A professional designer would allocate

the most appropriate scheme to the different sections of hedge-row. on any farm.

Proposal: Allow some Pillar-II monies to be used for such schemes outlined above.

4... Complementary land use

scheme: In many parts of Europe, when snow melts, it is common to move flocks onto mountain pastures in summer and back to the lowlands at the end of the season in Autumn. Such mountain pastures, not being suitable for winter living. In Ireland a sizable area of permanent pasture with heavy wet soils is not suitable for early grazing and has particular problems with nutrient run-off when attempts are made to intensify production on them. They are, though, very good summer pastures. Likewise there are areas where winter pasture on very dry limestone soils is traditional but these can run into summer grazing difficulties in dry weather.

Proposal: I propose some monies be made available for a preliminary investigation into the feasibility of combining such two types of land into productive units where the disadvantages of both are eliminated. The advantages would be less nutrient losses, less winter damage to soils and a more sustainable production system for animal agriculture and a more sociable & sustainable rural farming community in both types of farmed land areas. The experience of Europe would enlighten veterinary concerns with animal movement.

5... Climate issues: During my career I have got to know a handful of meteorological and solar physicists. All say the IPCC message is exaggerated. I note the AR6 "Summary for Policymakers" is finalised but not the full "Technical Report". Does that not sound strange? Apparently the politically motivated officials who finalised the "Summary for Policymakers"! have said any changes to the full report should not contradict their Summary Report !! Tail wagging dog scenario!!! I think any Irish scientist dealing with climate should be aware of the following papers by internationally well known scientists born in Ireland or living and working on the Island of Ireland:-

- Paper by Ronan Connolly et al 2021 [with 23 authors including John (CJ) Butler of Armagh Observatory and Ronan's father Michael Connolly and very well known

Physicists Willie Soon and Sallie Balliunas, plus well known Mathematician Nicola Scafetta and others] which in summary says about 2/3rds of the warming we have seen in recent decades to a century could be solar, not CO₂, related. John Butler has publications of his own quoted in this paper going back to the late 1990s and early 2000s which suggest a similar picture. John was born on a

He is a frequent visitor to Dublin and can easily be contacted for further information as indeed can

- Full Ronan Connolly et al Paper: [How much has the Sun influenced Northern Hemisphere temperature trends? An ongoing debate - IOPscience](#)
- Popular summary of the paper above with quotes from many of the authors: [How much has the Sun influenced Northern Hemisphere temperature trends? An ongoing debate / by Center for Environmental Research & Earth Sciences / Aug, 2021 / Medium](#)
- Paper by Ray Bates 2016, ex-head of Research Met Eireann, ex-head of Planetary Climate unit NASA Washington and later Prof of Meteorology at the Niels Bohr Institute -Uni of Copenhagen This paper reinforces a paper by Lindzen & Choi (2011) which claims the GWP of CO₂ is less than 1°C not the midrange value of 3°C [2.0 - 4 °C] claimed by the IPCC. Ray's paper gives a more precise figure pinning the GWP at just 1°C: - Full Paper and supporting papers:-
 - [Estimating climate sensitivity using two-zone energy balance models - Bates - 2016 - Earth and Space Science - Wiley Online Library](#)
 - [Lindzen, R. S., and Y.-S. Choi \(2011\), On the observational determination of climate sensitivity and its implications, Asia-Pacific J. Atmos. Sci., 47, 377– 390.](#)
 - Abstract: - [Lindzen: On the observational determination of climate... - Google Scholar](#)
- Papers by Willem van Wijngaarden and Will Happer which takes up a claim in a short paper by Irish American Tom Sheahan in 2014 which stated methane was 'irrelevant' as a GHG . Two papers were posted on the Cornell *arXiv web-site* for discussion on 8-June 2020 and 31 Mar 2021. Nobody has yet found a flaw with them. The Authors employed fundamental physics to estimate the

GWP of the 5- most abundant GHGs. The authors have used a data base for spectroscopists called HITRAN. to examine over 1.5M spectral lines

- The "work examined the transmission of infrared radiation through a cloud-free atmosphere from the Earth's surface to outer space. A line by line calculation used over 1.5 million lines of the five most important naturally occurring greenhouse gases, H₂O, CO₂, O₃, N₂O and CH₄ as well as CF₄ and SF₆. This included considerably weaker rovibrational line strengths, for H₂O as small as 10⁻²⁷ cm, than other studies. The calculation of forcings took into account the observed altitudinal concentrations of the various gases "
- The full papers can be downloaded by clicking the PDF link on the top right hand corner of the summaries
 - [\[2006.03098\] Dependence of Earth's Thermal Radiation on Five Most Abundant Greenhouse Gases](#)
 - [\[2103.16465\] Relative Potency of Greenhouse Molecules](#)

More information on these papers:

- [In unpublished paper, former White House climate adviser calls methane 'irrelevant' to climate | Science | AAAS](#)
- [The innocence of carbon dioxide by John A. Shanahan - issue](#)
- Dr Thomas Sheahen's original 2014 short Paper: [Methane: The Irrelevant Greenhouse Gas – Watts Up With That?](#)

The importance of the van Wijngaarden -Happer work is that it takes a very fundamental physics path to estimating the GWP of all GHGs not done by any other physicists. It will take time for the work to be fully absorbed by other physicists but they are well known to [REDACTED]

[REDACTED] They have said that their results verifies those of [REDACTED]

A Major new telescope is being erected in Chile costing €1.3bn when fully finished by the Southern European Observatory of which Ireland is a member. see: [ELT | ESO](#) .. Happer was the inventor of the laser system which makes this

telescope unique. It can create images on earth better than Hubble in space using his laser technology. He is regarded by physicists as the father of light and radiation physics; Van Wijngaarden was his prize student at Princeton. The latter is now full Professor of physics at York Uni Toronto.

Recent work mentioned by Frank Mitloehner of UC-Davis has raised an old question on natural background levels of methane. These authors are saying that Buffalo, Bison, Antelope and other animals of natural grasslands produced about the same methane emissions as today's farm animals. I can't find the link to the paper mentioned by Frank Mitloehner but this link to researchgate will give a glimpse the work that is going on in this area

- [*Methane emissions from bison—An historic herd estimate for the North American Great Plains | Request PDF*](#)

Furthermore other researchers are saying that emissions from coal mining ventilation, gas & oil well flaring, pipeline and transmission system leakage, inefficient furnace burning is responsible for a third of all methane emissions, The remainder is roughly divided in two: the smaller proportion from livestock bio-methane and the larger from natural wetlands bio-methane, plus some fossil gas leakage from geological sources. It should be noted that Coal, Oil and Gas extraction methane plus natural geological leakage adds to permanent CO2 increases in the atmosphere while bio-methane from all sources has a short half-life back to CO2 but this CO2 is recycled by photosynthesis back to plant material unlike that from the fossil methane. **All this raises the interesting question:** is the increase in methane emissions for the early 1800s more to do with coal mining and little or nothing to do with livestock particularly when you take the Mitloehner colleague assertion that present day livestock are only producing much the same quantity of methane that their wild ancestors did ???.

Proposal: Test all new CAP measures for compliance with rigorous science otherwise it could be money squandered. Every public servant and policy maker has an obligation to ensure that publicly funded schemes comply with rigorous science and that monies are not squandered.



This submission may be used in public

Hedgerows Ireland: A Results Based Hedgerow Incentive Scheme for CAP2023.

Policy Paper for **discussion & agreement with NGO stakeholders** prior to submission to State.

Objective: To **reward** farmers with hedgerows of highest environmental valueⁱ, while encouraging ALL farmers to **maintain** and **improve** all existing hedgerows.

Our proposal is to pay **all** single farm payment applicants for hedgerows on each Land Parcel, based on **length** and **quality**.

We recognise 3 main 'types' of hedgerow:

Internal Hedgerow: Landowner has 100% control, payment rate is 100% of relevant quality payment category (see below).

Farm Boundary Hedgerow: Landowner has 50% control (i.e. neighbouring property or roadside), payment rate is 50% of relevant quality payment category.

Heritage Hedgerow: Townland, parish, DED, county, and barony boundaries, payment rate is 150% of relevant quality payment category (due to cultural and historical importance).

Claims can be indicated on application maps submitted by the farmer or his agent/planner. To qualify for a particular Quality Category, the length of hedgerow must meet the minimum requirements in all 5 quality sub-categories outlined below. The scheme must have a 5-15 year target, allowing farmers to move up to higher quality categories over time. Higher Quality Category claims must be supported by geo-tagged photos, and will be subject to inspection by ecologists to confirm suitability.

Quality Category 3: Lowest payment per metre claimed, ~20% of budget.

Applicant must carry out a baseline hedgerow survey. Complete moratorium on hedgerow removal. Cutting and trimming of interior hedges on a 3-5 year rolling cycle, minimum height 1.5m and specimen trees to be retained. Roadside cutting allowed annually. No artificial nitrogen, slurry, FYM or pesticides within 5m of hedgerow base. Tillage parcels (except Organic) **must** have a 5m 'buffer zone' between hedge and crop area.

Width: Less than 3m average

Height: Less than 2m average

No. of 'mature' trees: Less than 5 per 100m hedgerow (farm average)

Biodiversity Index: Lowest 25% [Methodology to be used? e.g. Hedgerow Appraisal Systemⁱⁱ]

CO2 Sequestration Index: Lowest 25% [Methodology to be determined by consultation with experts]

Quality Category 2: Mean payment per metre claimed, ~47% of budget.

Applicant must carry out Category 3 above, **plus** specific regeneration projects subject to planner /ecologist/botanist/ survey and requirements. May include but not restricted to coppicing, laying, infill, native tree planting and new hedgerow establishment.

Objective is to upgrade hedgerows to Category 1 maximum payment for subsequent schemes.

[Greening payments? Optional or compulsory ?]

Width: Minimum average 3m wide

Height: Minimum average 3m high

No. of 'mature' trees: Minimum 5 trees per 100m (farm average)

Biodiversity Index: Middle 50%

CO2 Sequestration Index: Middle 50%

Quality Category 1: Highest payment per metre claimed, ~33% of budget.

Applicant must meet all of Category 2 & 3 requirements, having mature hedgerows with specimen trees.

Width: Minimum average 5m wide

Height: Minimum average 5m high

No. of 'mature' trees: Minimum 10 trees per 100m (farm average)

Biodiversity Index: Top 25%

CO2 Sequestration Index: Top 25%

ⁱ <https://www.gov.ie/en/consultation/d5d37-public-consultation-on-proposed-agri-environment-results-based-pilot-project/>

See Results of Survey Q. 19: 76% of respondents favour 'Maintenance and Enhancement of existing environment' as priority for result based scheme.

ⁱⁱ <http://www.woodlandsofireland.com/sites/default/files/hedgerow-survey.pdf>

CAP Consultation 2023-2027

Dear Minister

As part of the C.A.P consultation phase I wish to outline my views on the current proposals and address the key questions asked.

Firstly I would like to state that I'm a 37 year old full time organic beef and sheep farmer.

As a younger farmer due to the fact that I wasn't farming back in the reference years that made up the Single Farm Payment 20 years ago my entitlements have been at the lowest level all through my farming career. This old system that still prevails today is very unfair to the younger generation starting off and while I'm as active a farmer as the next and complying with all the regulations including regards to GAEC and Greening I'm being punished by the old system.

However the introduction of Convergence in the last C.A.P reform has been most beneficial to my business and as someone who due to there age and not being a farmer twenty years ago missed out on high value entitlements that if the old reference system was in place today would surely support someone in my position. I'm full in support of 100% convergence as a means of a fairer distribution to farmers and one in which the majority of farmers in Ireland stand to gain by. I feel its past time to level the payments for a fairer system for all farmers.

Secondly in order for a fairer CAP for all Irish farmers I feel a cap of 66,000 of a farmers BISS is needed to help redistribute funds and create a fairer payments system for all farmers.

Thirdly as the backbone of the Irish rural economy the suckler herd needs to be supported and I feel that a cap on cow numbers would be detrimental to the Irish beef industry and to the production of the high quality grass fed sustainable Irish beef for which we are know for worldwide.

If Ireland is to become more active in the fight against climate change the dept of Agriculture needs to do more to support the growth of the organic farming sector by ensuring organic payments increase to reflect the full cost of organic production and by prioritising organic farming under environmental schemes. TAMS supports for organic farmers should also continue.

In order to prevent active farmers who may have high entitlements on small holdings loosing out I'm also in favour of 10% front loading of payments up to max of 30 ha. As stated above I'm a full time organic farmer farming some of the most carbon rich high nature value farmland in the country and while not as productive as some of the more fertile land of the south east, from an environmental point of view my farm and farms in the north west of Ireland are much more sustainable, enviromentaly friendly and beneficial to local rural communities and business and should be supported with a fairer system of supports from the C.A.P.

One of the good things to come out of the current pandemic is the increase rate of people having the ability to work from home which along with a strong fairer C.A.P for all our farmers has the ability to revitalise rural Ireland to create a 21ST Century Ireland that we can all be proud off

I hope this is the beginning of that process

Kindest Regards

[Redacted Signature]

Wicklow Cheviot Sheep Owners' Association

The Wicklow Cheviot Sheep Owners Association represents many sheep farmers in Wicklow and surrounding counties.

Sheep farming is an important sector to the rural economy of Wicklow. It also plays an important role in maintaining the biodiversity of the hills. That said, it is a relatively low income sector. It is mostly undertaken in the hill areas, on marginal land with no option to diversify into other sectors. The age profile, of those involved, is high and younger farmers need to be attracted to it for its future viability. Some sheep farmers also have a suckler herds and these sectors need support to ensure their survival to sustain many farm families around the county and beyond.

In this respect, the Wicklow Cheviot Sheep Owners Association would like to propose the following measures:

1. A ewe payment of €30 should be paid to give sheep farmers a much needed income boost and an incentive for young farmers to come into the sector.
2. Any sheep improvement scheme should not have a condition that you are a member of Bord Bia's QA scheme. This is a market led scheme and should be retained as that. Hill farmers often sell lambs as stores, so there's no benefit being part of the QA scheme.
3. Any new environmental schemes should be voluntary and deliver payments of up to €15000. The eco scheme should not see a reduction in farm payment.
4. Any new scheme should recognise and award farmers for their efforts in maintaining and improving the biodiversity of the hills through grazing regimes by their sheep.
5. Suckler cow support is needed also. No capping of numbers should be introduced.
6. Any re-distribution of payments should be done in a fair manner. It is not always the case that those receiving higher payments need it less. Many farm families depend on payments to sustain them and reduction in payments is not acceptable.

Regards,

Sent from my iPhone