

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Re: Draft Environmental Support  
**Date:** Wednesday 10 November 2021 02:06:47  
**Attachments:** [Small-Farms-Survey.pdf](#)

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To whom it may concern,

My name is [REDACTED] from [REDACTED]

[REDACTED]

[REDACTED]

Still waiting on herd number, [REDACTED]

The first year of CAP 2023-27 and BISS will be our very first year officially farming and receiving any income from farming (direct payments or other). So it's very important to us, a new farming family, that we are a viable sustainable operation, and that we can contribute to tackling climate change.

This may seem like a rant, but it's not, it all ties in together at the end  
Please also note a document attached on sustainable of small farms, conducted by teagasc.

Our main concern is not so much how much money we get in direct payments, the eco schemes or ANC or the AECM schemes. Or how much work is involved, we would happily spend every hour on farm working towards a better environment. It's how much is taken away from our weekly income.

[REDACTED] we will be very much reliant on Farm Assist Payment. This is a weekly sum of [REDACTED] Now again this is more than enough to keep us going. But anything much under that would be difficult.

However, before we took on this enterprise we were not informed that the grants received effected this weekly wage. Neither were we informed that you can only put expenses of the previous year against it.

[REDACTED]

I am now left with the fact I cannot offset these expenses against our first payment in 2 years time (2023). Leaving us as a family [REDACTED], with no other income.

So my first point I would like to add is for NEW ENTRANT or YOUNG FARMERS, to get proper free consultation before starting the venture (3 hours in person meeting). The other point on this matter is to have a grant scheme for new entrants for starting up a new farm.

We know Tams II covers 60% of investment, but to get a herd number you need a crush,

planning permission, water, fencing etc already before you can even apply for TAMS II. So where is the help? I've seen countless reports and articles saying need new farmers to come into agriculture, but there is no help for a complete newcomer, starting from scratch.

If there was a scheme where a new farmer could buy the essential equipment off of a coop and pay in installments, and then a lump sum was given out of direct payments to the coop to pay it off.

My other issue in regards farm assist is with AECM.

Under GLAS REPS etc. A farmer could receive €2450 without it affecting the weekly farm assist payment.

If the government are serious about farmers signing up for the most environmental measures, then this figure needs to be increased to at least €5000, if not completely abolished for small farmers on low incomes, ie those on farm assist.

Adopting these suggestions would ensure more small farmers undertook environmental measures each and every year.

Please see document attached on small farms by teagasc. A few key points that are relevant are:

- Small farms are less than 14hectares.
- more animal growth per nutrients excess (low input/high grass use)
- Emit less greenhouse gas emissions than bigger farms, but in relation to output this is less efficient, ie more emissions per kg of produce than larger farms
- output average €800/ha on small farm, 30% less than larger farm
- small farms employ less than half unit labour per year
- direct payment:eco scheme is 50:50 for income ratio breakdown
- 50% small farms are unviable income

If small farms were allowed to retain more or all of environmental payments (ie not affect farm assist) then:

- > Environmental schemes become more attractive (without increasing payment of scheme)
- > Increase completion and success of environmental objectives
- > Income/Farm becomes more viable
- > Greenhouse gas emissions are more offset by extra trees/less pollution etc, more carbon neutral
- > Animal growth rate remains higher than larger farms
- > Potential to generate employment on farm, extra money in pocket can higher in help for certain jobs (added social aspect to farmer)
- > Retaining more money each week allows for more money spent in local economy, reinvesting own money back into farm (less reliant on Tams grants for less expensive investment, ie fencing, weighing scales etc).

How it would work:

Take my farm for example in 2023

Biss [redacted] (farmjournal calculator)

ANC [redacted]

YFP [redacted] direct payments total

AECM payment [redacted] total



By our business plan we will spend [REDACTED] in total on farm in year 2023  
Leaving me with [REDACTED] as income/profit to take off farm assist weekly payment

My approx payment farm assist will go from [REDACTED] per week (x52 weeks)  
[REDACTED] per year  
[REDACTED] (no adjustment AECM)

[REDACTED] total income.

That is a huge difference to a small farmer, young farmer, new entrant.

It pays for few extra dairy bull calf to fatten, it's an extra hectare of native trees, it's a herd of meat goats, it's a second hand electric car. It's buying better handling facilities, it's employing someone to help put in a few hedgerows, or do the coppice.

Conclusion:

With the following recommendations/proposals, new entrants, young farmers and small farmers can help create a more viable, sustainable and environmentally beneficial agricultural sector that could lead the way in Europe.

By allowing these farmers to retain their weekly income, by not deducting the money earned from at least the AECM schemes, they will have the ability to partake in more environmental schemes, invest more in their own farms and local economies, become more efficient, create employment and it won't cost any extra money, no extra funding would be required.

Thank you for taking the time to read my response.

If you have any further queries about my comments please ring me [REDACTED].

Kind regards

[REDACTED]

Sent from my Vodafone Smart

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Wool fertiliser and eco schemes in CAP  
**Date:** Friday 12 November 2021 00:16:30

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To whom it may concern

In relation to the proposed eco schemes in CAP, the Irish Wool discussion group has asked and lobbied for research to be done on wool pellets as a form of fertiliser [REDACTED]

[REDACTED] all we need is the research results. I have asked several times what is teagasc doing with the wool it produces and cant get an answer. The questions are simple can wool pellets be used on grassland or cereal ground and how slow release are they? With fertiliser prices the way they are answers to these questions are needed yesterday I did mention this in my submission to the feasibility study. The results on suinting wool on farm to reduce the cost of washing wool are also needed and the results on the NPK values of suint are also needed. Can suint be mixed with slurry?

The above questions were given to the Director General of IFA at a moon branch meeting today the 11th November.

I look forward to hearing from you.

Regards [REDACTED]



**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Ivy on trees  
**Date:** Tuesday 16 November 2021 13:11:32

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Trees chooked with ivy around alot of farms if there was a measure or action to take on this problem also on old sheds house s

Regards

[REDACTED]

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**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** CAP and organic farming  
**Date:** Tuesday 16 November 2021 13:33:23

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Dear Sir

[REDACTED] and although I see the benefit of organic farming for the climate, soil etc.,. I am having to reconsider staying in organics as I need to make a living and at present, I am not making a liveable wage. Why?... I receive very little payment per acre from the organic grant as I also participate in GLASS... THE PENIASISING for double payments equates to zero euros if you are an organic farmer... there needs to be a standalone payment for having land farmed under organic. This puts us on the same status when applying for schemes as the conventual farmer. It would also incentive conventional farmers to consider organic farming ,as the bottom line of farm income is the most important issue for all farmers.  
regards [REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** draft CAP Strategic Plan 2023-2027  
**Date:** Tuesday 16 November 2021 15:31:15

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Hello there,

I am writing as an organic farmer. As highlighted by the organic association please ensure organic payments reflect the full cost of production and invest in organic infrastructure.

Cheers,

[REDACTED]



**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** draft CAP Strategic Plan 2023-2027  
**Date:** Tuesday 16 November 2021 19:03:10

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Hello,

I would like to suggest a few measures towards the CAP Strategic Plan from the perspective of a young organic beef farmer's point of view.

We need to:

- **Invest in organic infrastructure:** through increased TAMS funding to develop facilities and support setting up of shorter food supply chains, processing and direct selling.
- **Increase organic payments to fully reflect the cost of production.** The rates in Ireland are some of the lowest in the EU. An increased rate would encourage existing and new organic farmers to produce food organically in a sustainable way and thus move towards the climate change goals of the country.
- **Stop penalising organic farmers in eco-schemes.** We should be encouraged to take on more measures to improve the environment and reduce emissions rather than having accusations of double-funding for voluntarily farming in a more-sustainable and eco-friendly way.

These are my submissions for consideration.

Regards,

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Date:** Tuesday 16 November 2021 21:51:42

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To whom it may concern. I would like to express my concern at the proposal of making it mandatory to be a member of board bia's assurance scheme in the new suckler scheme. I for one would not enter into any shuch scheme .

[REDACTED]

From: [REDACTED]  
To: [info@raisa.ie](mailto:info@raisa.ie)  
Subject: CAP 2023/2027  
Date: Wednesday 17 November 2021 12:00:41

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## KEY DEMANDS FOR FAIR PLAY FOR ORGANIC FARMERS UNDER THE NEW CAP

### 1. Ensure organic payments reflect the full costs of organic production

Whilst the overall budget for organic payments is expected to increase substantially, **there is not a significant increase in payment rates for most sectors, and in some cases no increase.** Payment rates really need to fully reflect the typical costs compared to other representative conventional Irish farms. If this does not change Ireland will continue to have some of the lowest payment rates in the EU and be potentially at a competitive disadvantage.

### 2. Fully prioritise organic farming under environmental schemes in addition to organic payments

All organic farmers will have priority access to the new agri-environment-climate scheme and access to some eco-scheme options to further boost their environmental and climate performance. However, organic farmers may have to forgo organic payments in certain instances if some unsupported claims of double funding are not addressed.

### 3. Invest in organic farm infrastructure and processing to stimulate sector growth

Organic TAMS and processing grants can help farmers to develop their businesses sustainably. These supports should be strengthened with the budget allocation increased to cover 60% of the eligible costs. This would send a clearer signal of the Government's commitment to the development of organic food and farming systems.



**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Submission regards "draft CAP Strategic Plan 2023 - 2027"  
**Date:** Thursday 18 November 2021 14:01:22

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To whom it may concern,  
[REDACTED]

I wish to make the following submission regarding the organic sector:

- Compensation in OFS in my opinion is too low to reflect costs and entice farmers into the sector. I am finding that it isn't simply attractive enough for my clients to consider making a switch to organics.
- Organic farmers have to forego payments in certain instances where they have picked area based payments in agri environmental schemes. I can certainly say that this is a major impediment to a lot of my clients joining organic farming. I would guess that a quarter of my clients would seriously consider organic farming only for this.
- Whilst I read that it is proposed to raise TAMS to 50% funding for organic farmers I would propose that it is raised to 60% rate to match YFCIS in TAMS. This is due to specialised investment in machinery or say additional loose housing costs needed to meet the organic standards - in my opinion this should be strongly boosted (even if extra had to come from increased organic budget).
- I would strongly urge that any future OFS is open on a year round basis. In my opinion opening up OFS for a short window in the middle of a very busy schedule is a disaster from my advisory point of view. Giving rushed advice is not one bit satisfactory from my point of view or farmers for that matter. I would consider myself an experienced and well versed organic advisor but have absolutely no interest whatsoever in seeking to work in the organic advisory/planning area except for my own clients only, due to the way OFS scheme is opened and closed. I am hearing enough similar sentiment on the ground as well. In my opinion the advisory service gets absolutely everything thrown at them from all the different sections of the DAFM at whatever time that they have no control over whatsoever making planning for work difficult. I can't see why future OFS cannot open on a year round basis.

Finally whilst it is great to see aspirations in increasing the organic farming sector, i do worry about the marketing ability to sell organic produce. While I'm sure tillage, dairy and especially horticulture are in strong marketing positions to sell their produce, I think beef and especially lamb are not as strong. I'm sure DAFM can easily get the data but from what I can see there is great difficulty in getting lamb to market. I am sure that there is a market for lamb and beef that is not being tapped into. In my opinion there is a need for strong marketing working in conjunction with abattoirs/meat procurement/selling companies. Should this be independent of Bord Bia or a strong element within Bord Bia with a brief to absolutely go for it and reach for the stars!?

Of course increasing the percentage of organic farmers has knock on effects for water quality and climate change though more balanced farming practices and should definitely sell Ireland.inc more favourably abroad.

Best Regards,  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Measures for inclusivity in next CAP  
**Date:** Sunday 21 November 2021 19:57:25

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Good afternoon,

I would like to outline my concerns in regard to the announced incentives for female farmers in the next CAP.

Women in farming have been historically overlooked when it comes to gaining access to land and in terms of being regarded as farm successors. These issues were also highlighted in the Department of Agriculture's own SWOT analysis. According to the CSO, just over 16,000 women - 12% of farmers - are head of a farm holding and yet the same figures show that some 70,000 women work on farms everyday - 40,000 of whom are spouses.

Addressing gender equality is a key tenet of the CAP legal text and Article 6 point (h), specifically refers to the need for Member States to ensure that female farmers are supported in the next CAP.

### **60% TAMS for women**

However, as outlined below, I have serious concerns regarding the recently announced 60% targeted agricultural mechanisation scheme (TAMS) grant for "qualified" female farmers.

The current criteria means that only women between 40 and 55 years of age can avail of the grant if they have at least a Level 6 degree in Agriculture. I understand that these measures have been put in to safeguard generational renewal and ensure that women are not added to farm partnerships as empty tokens.

However, according to the Department's own figures as shown below there just 5,576 women out of 19,853 potentially fit this age criteria and have access to the grant. It is also not known how many of these women have the required qualification to meet the criteria, thus potentially further cutting off the number of women who can avail of the grant.

I would ask the Department to consider:

- Less than 4% of TAMS funding went to women



- Just 3.8% of farms are registered in joint male/female names
- More women over 80 years of age are considered "actively" farming than those under 40
- The number of available places on Level 6 courses if there were an influx of women registering to join
- The repeated concerns of women in the age demographic that has been highlighted in regard to childcare demands and the need for flexible learning requirements.
- The fact that a number of older women who worked on farms now face old age without a pension because their PRSI stamps were not paid - some of these women were originally discriminated against due to the marriage bar.

Age Band	Count (Male)	Count (Female)
Between 18 and 24	479	107
Between 25 and 29	1719	285
Between 30 and 34	2979	520
Between 35 and 39	5444	928
Between 40 and 44	8428	1483
Between 45 and 49	11003	1884
Between 50 and 54	13260	2209
Between 55 and 59	14765	2411
Between 60 and 64	14362	2332
Between 65 and 69	12787	2160
Between 70 and 74	10724	1952
Between 75 and 79	7438	1425
Greater than or equal to 80	8724	2157
<b>Total</b>	<b>110112</b>	<b>19893</b>

On the back of these considerations, I back the WASG recommendations that the Department should take on board when developing CAP plans. That women with at least a Level 6 in Agriculture or who have been heads of a farm

**holding for at least three years** qualify for the TAMS 60% grant. This marks the experience that the women have gained running their own holding and eliminates the possibility that women could be added as tokens in time for the grant to take effect in 2023.

- While the WASG respect the need for generational renewal the age limit for the 60% TAMS must be raised to the incoming pension age of 67 - this is vital in the context of ensuring that older women who are active on family farms are given the support to become equal partners before reaching pension age and avoid repeating mistakes of the past.
- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership - similar to the current partnership model where a young trained farmer joins.
- The need to ensure that an older generation of women begin to be seen as equal farm partners to ensure that younger women start to see the positive cultural change in farming and feel encouraged to take on farming as a career - thus helping



gender equality and generational renewal.

I would further ask the Department to consider that the meaningful cultural change that is needed in terms of addressing inclusivity in Irish farming requires flexibility and understanding of the unique issues that can impact women as farmers. I understand that criteria are necessary for any scheme but reducing, limiting and creating barriers to a scheme that is designed to support women undoes the goodwill and potential efficacy of a scheme before it has even started.

Many thanks,



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**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Measures for inclusivity in next CAP  
**Date:** Sunday 21 November 2021 19:58:52

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• That women with at least a Level 6 in Agriculture **or who have been head of a farm holding for at least three years** qualify for the TAMS 60% grant. This marks the experience that the women have gained running their own holding and eliminates

the possibility that women could be added as tokens in time for the grant to take effect in 2023.

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scheme before it has even started.

Many thanks,

[REDACTED]

Sent from my iPhone

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Measures for inclusivity in next CAP  
**Date:** Sunday 21 November 2021 20:01:09

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Many thanks,



**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Measures for inclusivity in next CAP  
**Date:** Sunday 21 November 2021 20:04:39

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The current criteria means that only women between 40 and 55 years of age can avail of the grant if they have at least a Level 6 degree in Agriculture. I understand that these measures have been put in to safeguard generational renewal and ensure that women are not added to farm partnerships as empty tokens.

However, according to the Department's own figures as shown below there just 5,576 women out of 19,853 potentially fit this age criteria and have access to the grant. It is also not known how many of these women have the required qualification to meet the criteria, thus potentially further cutting off the number of women who can avail of the grant.

I would ask the Department to consider:

- Less than 4% of TAMS funding went to women
- Just 3.8% of farms are registered in joint male/female names
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- The number of available places on Level 6 courses if there were an influx of women registering to join
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<b>Age Band</b>	<b>Count (Male)</b>	<b>Count (Female)</b>
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Between 50 and 54	13260	2209
Between 55 and 59	14765	2411
Between 60 and 64	14362	2332
Between 65 and 69	12787	2160
Between 70 and 74	10724	1952
Between 75 and 79	7438	1425
Greater than or equal to 80	6724	2157
<b>Total:</b>	<b>110112</b>	<b>19853</b>

On the back of these considerations, I back the WASG recommendations that the Department should take on board when developing CAP plans.

- That women with at least a Level 6 in Agriculture **or who have been head of a farm holding for at least three years** qualify for the TAMS 60% grant. This marks the experience that the women have gained running their own holding and eliminates the possibility that women could be added as tokens in time for the grant to take effect in 2023.
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Many thanks,

A solid black rectangular redaction box covering the signature area.

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Measures for inclusivity in next CAP  
**Date:** Sunday 21 November 2021 20:07:29

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**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Date:** Sunday 21 November 2021 20:26:36

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Between 70 and 74	10724	1452
Between 75 and 79	7138	1425
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<b>Total:</b>	<b>110,112</b>	<b>19,893</b>

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Many thanks,

Sent from my iPhone

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Measures for inclusivity in next CAP  
**Date:** Sunday 21 November 2021 20:29:24

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<b>Total:</b>	<b>110112</b>	<b>19895</b>

On the basis of these considerations, I back the WASG recommendations that the Department should take on board when developing CAP plans. That women with at least a Level 6 in Agriculture **or who have been head of a farm holding for at least three years** qualify for the TAMS 60% grant. This marks the experience that the women have gained running their own holding and eliminates the possibility that women could be added as tokens in time for the grant to take effect in 2023.

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**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Measures for inclusivity in next CAP  
**Date:** Sunday 21 November 2021 20:33:15

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[Redacted signature]

[Redacted contact information]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Measures for inclusivity in next CAP  
**Date:** Sunday 21 November 2021 21:42:48

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**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Measures for inclusivity in next CAP  
**Date:** Monday 22 November 2021 04:49:20

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Regards,

.

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Date:** Monday 22 November 2021 14:11:33

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Good afternoon,

I back the WASG recommendations that the Department should take on board when developing CAP plans.

- That women with at least a Level 6 in Agriculture or who have been head of a farm holding for at least three years qualify for the TAMS 60% grant.
- The 60% TAMS age limit must be raised to the incoming pension age of 67 - this is vital in the context of ensuring that older women who are active on family farms are given the support to become equal partners before reaching pension age and avoid repeating mistakes of the past.
- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Tams grant for women  
**Date:** Monday 22 November 2021 16:14:03

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To whom it may concern,

However, as outlined below, I have serious concerns regarding the recently announced 60% targeted agricultural mechanisation scheme (TAMS) grant for "qualified" female farmers.

The current criteria means that only women between 40 and 55 years of age can avail of the grant if they have at least a Level 6 degree in Agriculture. I understand that these measures have been put in to safeguard generational renewal and ensure that women are not added to farm partnerships as empty tokens.

However, according to the Department's own figures as shown below there just 5,576 women out of 19,853 potentially fit this age criteria and have access to the grant. It is also not known how many of these women have the required qualification to meet the criteria, thus potentially further cutting off the number of women who can avail of the grant.

I would ask the Department to consider:

- Less than 4% of TAMS funding went to women
- Just 3.8% of farms are registered in joint male/female names
- More women over 80 years of age are considered "actively" farming than those under 40
- The number of available places on Level 6 courses if there were an influx of women registering to join
- The repeated concerns of women in the age demographic that has been highlighted in regard to childcare demands and the need for flexible learning requirements.
- The fact that a number of older women who worked on farms now face old age without a pension because their PRSI stamps were not paid - some of these women were originally discriminated against due to the marriage bar.

<b>Age Band</b>	<b>Count (Male)</b>	<b>Count (Female)</b>
Between 18 and 24	479	107
Between 25 and 29	1719	285
Between 30 and 34	2979	520
Between 35 and 39	5444	928
Between 40 and 44	8428	1483
Between 45 and 49	11003	1884

Between 50 and 54	13260	2209
Between 55 and 59	14765	2411
Between 60 and 64	14362	2332
Between 65 and 69	12787	2160
Between 70 and 74	10724	1952
Between 75 and 79	7438	1425
Greater than or equal to 80	6724	2157
<b>Total:</b>	<b>110112</b>	<b>19853</b>

On the back of these considerations, I back the WASG recommendations that the Department should take on board when developing CAP plans.

- That women with at least a Level 6 in Agriculture **or who have been head of a farm holding for at least three years** qualify for the TAMS 60% grant. This marks the experience that the women have gained running their own holding and eliminates the possibility that women could be added as tokens in time for the grant to take effect in 2023.
- While the WASG respect the need for generational renewal the age limit for the 60% TAMS must be raised to the incoming pension age of 67 - this is vital in the context of ensuring that older women who are active on family farms are given the support to become equal partners before reaching pension age and avoid repeating mistakes of the past.
- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership - similar to the current partnership model where a young trained farmer joins.
- The need to ensure that an older generation of women begin to be seen as equal farm partners to ensure that younger women start to see the positive cultural change in farming and feel encouraged to take on farming as a career - thus helping gender equality and generational renewal.

I would further ask the Department to consider that the meaningful cultural change that is needed in terms of addressing inclusivity in Irish farming requires flexibility and understanding of the unique issues that can impact women as farmers. I understand that criteria are necessary for any scheme but reducing, limiting and creating barriers to a scheme that is designed to support women undoes the goodwill and potential efficacy of a scheme before it has even started.

Many thanks,

Sent from my iPhone

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Date:** Monday 22 November 2021 21:17:26

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Good afternoon,

I back the WASG recommendations that the Department should take on board when developing CAP plans.

- That women with at least a Level 6 in Agriculture or who have been head of a farm holding for at least three years qualify for the TAMS 60% grant.
- The 60% TAMS age limit must be raised to the incoming pension age of 67 - this is vital in the context of ensuring that older women who are active on family farms are given the support to become equal partners before reaching pension age and avoid repeating mistakes of the past.
- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

[REDACTED]



**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** CAP  
**Date:** Monday 22 November 2021 21:36:05

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Good afternoon,

I back the WASG recommendations that the Department should take on board when developing CAP plans.

- That women with at least a Level 6 in Agriculture or who have been head of a farm holding for at least three years qualify for the TAMS 60% grant.
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- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** WASG CAP recommendations  
**Date:** Monday 22 November 2021 22:17:03

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Good evening,

I back the WASG recommendations that the Department should take on board when developing CAP plans.

- That women with at least a Level 6 in Agriculture or who have been head of a farm holding for at least three years qualify for the TAMS 60% grant.

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- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** WASG recommendations  
**Date:** Monday 22 November 2021 22:18:51

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Good evening,

I back the WASG recommendations that the Department should take on board when developing CAP plans.

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- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** CAP consultation  
**Date:** Monday 22 November 2021 22:29:49

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Good evening,

I back the women in Agriculture Stakeholders Group (WASG) recommendations that the Department should take on board when developing CAP plans.

- That women with at least a Level 6 in Agriculture **or** who have been head of a farm holding for at least three years qualify for the TAMS 60% grant.
- The 60% TAMS age limit must be raised to the incoming pension age of 67 - this is vital in the context of ensuring that older women who are active on family farms are given the support to become equal partners before reaching pension age and avoid repeating mistakes of the past.
- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** CAP Consultation  
**Date:** Tuesday 23 November 2021 08:39:36

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To Whom It May Concern

I back the WASG recommendations that the Department should take on board when developing CAP plans:

- That women with at least a Level 6 in Agriculture or who have been head of a farm holding for at least three years qualify for the TAMS 60% grant.
- The 60% TAMS age limit must be raised to the incoming pension age of 67 - this is vital in the context of ensuring that older women who are active on family farms are given the support to become equal partners before reaching pension age and avoid repeating mistakes of the past.
- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Regards

[REDACTED]

I back the WASG recommendations that the Department should take on board when developing CAP plans.

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- The 60% TAMS age limit must be raised to the incoming pension age of 67 - this is vital in the context of ensuring that older women who are active on family farms are given the support to become equal partners before reaching pension age and avoid repeating mistakes of the past.

- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the



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qualify for the TAMS 60%  
grant.

- The 60% TAMS age limit  
must be raised to the incoming  
pension age of 67 - this is  
vital in the context of ensuring  
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given the support to become  
equal partners before reaching  
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repeating mistakes of the past.

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minimum level 6 qualification  
in agriculture who meet the  
eligible age criteria can obtain  
a 60% TAMS grant within the  
partnership.

Yours sincerely,

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**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Women in agriculture  
**Date:** Tuesday 23 November 2021 16:13:47

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- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** WASG recommendations for CAP  
**Date:** Tuesday 23 November 2021 18:38:20

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- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely

[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** CAP Plans- WASG  
**Date:** Wednesday 24 November 2021 07:29:41

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- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Title: Measures for inclusivity in next CAP  
**Date:** Wednesday 24 November 2021 11:14:27

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Good afternoon,

I would like to outline my concerns in regard to the announced incentives for female farmers in the next CAP.

Women in farming have been historically overlooked when it comes to gaining access to land and in terms of being regarded as farm successors. These issues were also highlighted in the Department of Agriculture's own SWOT analysis. According to the CSO, just over 16,000 women - 12% of farmers - are head of a farm holding and yet the same figures show that some 70,000 women work on farms everyday - 40,000 of whom are spouses.

Addressing gender equality is a key tenet of the CAP legal text and Article 6 point (h), specifically refers to the need for Member States to ensure that female farmers are supported in the next CAP.

### **60% TAMS for women**

However, as outlined below, I have serious concerns regarding the recently announced 60% targeted agricultural mechanisation scheme (TAMS) grant for "qualified" female farmers.

The current criteria means that only women between 40 and 55 years of age can avail of the grant if they have at least a Level 6 degree in Agriculture. I understand that these measures have been put in to safeguard generational renewal and ensure that women are not added to farm partnerships as empty tokens.

However, according to the Department's own figures as shown below there just 5,576 women out of 19,853 potentially fit this age criteria and have access to the grant. It is also not known how many of these women have the required qualification to meet the criteria, thus potentially further cutting off the number of women who can avail of the grant.

I would ask the Department to consider:

- Less than 4% of TAMS funding went to women
- Just 3.8% of farms are registered in joint male/female names
- More women over 80 years of age are considered "actively" farming than those under 40

- The number of available places on Level 6 courses if there were an influx of women registering to join
- The repeated concerns of women in the age demographic that has been highlighted in regard to childcare demands and the need for flexible learning requirements.
- The fact that a number of older women who worked on farms now face old age without a pension because their PRSI stamps were not paid - some of these women were originally discriminated against due to the marriage bar.

<b>Age Band</b>	<b>Count (Male)</b>	<b>Count (Female)</b>
Between 18 and 24	479	107
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Between 30 and 34	2979	520
Between 35 and 39	5444	928
Between 40 and 44	8428	1483
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Between 55 and 59	14765	2411
Between 60 and 64	14362	2332
Between 65 and 69	12787	2160
Between 70 and 74	10724	1952
Between 75 and 79	7438	1425
Greater than or equal to 80	6724	2157
<b>Total:</b>	<b>110112</b>	<b>19853</b>

On the back of these considerations, I back the WASG recommendations that the Department should take on board when developing CAP plans.

- That women with at least a Level 6 in Agriculture **or who have been head of a farm holding for at least three years** qualify for the TAMS 60% grant. This marks the experience that the women have gained running their own holding and eliminates the possibility that women could be added as tokens in time for the grant to take effect in 2023.
- While the WASG respect the need for generational renewal the age limit for the 60% TAMS must be raised to the incoming pension age of 67 - this is vital in the context of ensuring that older women who are active on family farms are given the support to become equal partners before reaching pension age and avoid repeating mistakes of the past.
- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership - similar to the current partnership model where a young trained farmer joins.
- The need to ensure that an older generation of women begin to be seen as equal farm partners to ensure that younger women start to see the positive cultural change in farming and feel encouraged to take on farming as a career - thus helping

gender equality and generational renewal.

I would further ask the Department to consider that the meaningful cultural change that is needed in terms of addressing inclusivity in Irish farming requires flexibility and understanding of the unique issues that can impact women as farmers. I understand that criteria are necessary for any scheme but reducing, limiting and creating barriers to a scheme that is designed to support women undoes the goodwill and potential efficacy of a scheme before it has even started.

Many thanks,



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**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** CAP public consultation process - feedback  
**Date:** Wednesday 24 November 2021 13:54:37

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Hello,

As beekeepers and farmers, we just wanted to add our voices to this point made at the link below, about hedgerows in Ireland. The article looks for a small wording change in the proposed CAP in order to support hedges being kept to a minimum size. The reason being to protect our hedgerows to strengthen biodiversity and help our bee stocks.

<https://www.agriland.ie/farming-news/cap-hedgerows-important-role-in-climate-change-mitigation-overlooked/>

Le gach dea-ghuí,

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Date:** Wednesday 24 November 2021 19:19:44

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Email: [capstrategicplan@agriculture.gov.ie](mailto:capstrategicplan@agriculture.gov.ie)

Good afternoon,

I back the WASG recommendations that the Department should take on board when developing CAP plans.

- That women with at least a Level 6 in Agriculture or who have been head of a farm holding for at least three years qualify for the TAMS 60% grant.
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- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Recommendations from WASG  
**Date:** Wednesday 24 November 2021 23:57:54

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Good afternoon,

I back the WASG recommendations that the Department should take on board when developing CAP plans.

- That women with at least a Level 6 in Agriculture or who have been head of a farm holding for at least three years qualify for the TAMS 60% grant.
- The 60% TAMS age limit must be raised to the incoming pension age of 67 - this is vital in the context of ensuring that older women who are active on family farms are given the support to become equal partners before reaching pension age and avoid repeating mistakes of the past.
- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

Kind regards

[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** WASG recommendations  
**Date:** Thursday 25 November 2021 09:29:25

---

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Good afternoon,

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- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** CAP  
**Date:** Thursday 25 November 2021 10:23:06

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Good Morning,

I back the WASG recommendations that the Department should take on board when developing CAP plans.

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- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

[REDACTED]  
[REDACTED] working hard as any man along side running family home and getting no recognition and very little pension-#INEQUALITY

Yours sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** TAMS Grant  
**Date:** Thursday 25 November 2021 20:12:43

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- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

[REDACTED]



**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Re: Measures for inclusivity in next CAP  
**Date:** Sunday 28 November 2021 18:35:39

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Good evening,

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Women in farming have been historically overlooked when it comes to gaining access to land and in terms of being regarded as farm successors. These issues were also highlighted in the Department of Agriculture's own SWOT analysis. According to the CSO, just over 16,000 women - 12% of farmers - are head of a farm holding and yet the same figures show that some 70,000 women work on farms everyday - 40,000 of whom are spouses.

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### **60% TAMS for women**

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The current criteria means that only women between 40 and 55 years of age can avail of the grant if they have at least a Level 6 degree in Agriculture. I understand that these measures have been put in to safeguard generational renewal and ensure that women are not added to farm partnerships as empty tokens.

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I would ask the Department to consider:

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Just 3.8% of farms are registered in joint male/female names

- More women over 80 years of age are considered "actively" farming than those under 40
- The number of available places on Level 6 courses if there were an influx of women registering to join
- The repeated concerns of women in the age demographic that has been highlighted in regard to childcare demands and the need for flexible learning requirements.
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Between 65 and 69	12787	2160
Between 70 and 74	10724	1952
Between 75 and 79	7438	1425
Greater than or equal to 80	6724	2157
<b>Total:</b>	<b>110112</b>	<b>19853</b>

On the back of these considerations, I back the WASG recommendations that the Department should take on board when developing CAP plans:

- That women with at least a Level 6 in Agriculture **or who have been head of a farm holding for at least three years** qualify for the TAMS 60% grant. This marks the experience that the women have gained running their own holding and eliminates the possibility that women could be added as tokens in time for the grant to take effect in 2023.
- While the WASG respect the need for generational renewal the age limit for the 60% TAMS must be raised to the incoming pension age of 67 - this is vital in the context of ensuring that older women who are active on family farms are given the support to become equal partners before reaching pension age and avoid repeating mistakes of the past.
- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership - similar to the current partnership model

where a young trained farmer joins.

- The need to ensure that an older generation of women begin to be seen as equal farm partners to ensure that younger women start to see the positive cultural change in farming and feel encouraged to take on farming as a career - thus helping gender equality and generational renewal.

I would further ask the Department to consider that the meaningful cultural change that is needed in terms of addressing inclusivity in Irish farming requires flexibility and understanding of the unique issues that can impact women as farmers. I understand that criteria are necessary for any scheme but reducing, limiting and creating barriers to a scheme that is designed to support women undoes the goodwill and potential efficacy of a scheme before it has even started.

Many thanks,

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**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** BPS Satellite Inspections  
**Date:** Tuesday 30 November 2021 12:14:31

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A chara,

This may not be in line with what is specifically being sought for this Consultation, however I wish to make the following proposal:

‘All results of Remote Inspections for Basic Payment Scheme be withheld to be published at 4 dates in the year. For example 1<sup>st</sup> February, 1<sup>st</sup> July, 1<sup>st</sup> September, 1<sup>st</sup> November’.

A significant proportion (12%) of my Basic Payment Scheme clients had payments withheld and are yet to be paid this for 2021’s Scheme as of today’s date due to satellite inspections. The majority of these had nothing wrong with their land areas.

By restricting publishing of results of inspections to certain dates, it would be hoped that no satellite inspections would hold up the clearance of Basic Payment Scheme Applications, and that responses to outcomes could be published in time for payment dates. To have farmers waiting over 6 weeks later than expected for a significant payment due in the year puts causes significant stress that if possible should be avoided.

Regards,

[REDACTED]

[REDACTED]  
[REDACTED]

**Attention:**

This e-mail is privileged and confidential. If you are not the intended recipient please delete the message and notify the sender. Any views or opinions presented are solely those of the author. This email was scanned by Teagasc and has been certified virus free with the pattern file currently in use. This however cannot guarantee that it does not contain malicious content.

**Tabhair aire:**

Tá an r-phost seo faoi phribhléid agus faoi rún. Mura tusa an duine a bhí beartaithe leis an teachtaireacht seo a fháil, scríos é le do thoil agus cuir an seoltóir ar an eolas. Is leis an údar amháin aon dearcaí nó tuairimí a léirítear. Scanadh an r-phost seo le Teagasc agus deimhníodh go raibh sé saor ó víoras leis an bpatrúnchomhad atá in úsáid faoi láthair. Ní féidir a ráthú leis seo áfach nach bhfuil ábhar mailíseach ann.

Registered Charity Number: [REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Cap Environment sub,  
**Date:** Tuesday 30 November 2021 19:09:51

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Dear Department of Agriculture,

I am sending this email as my submission.

I propose that hill sheep farmers receive support of €35 / ewe on environmental grounds because of the benefit mountain sheep are at keeping our mountains in pristine condition, Many of our mountains are designated SAC and the reason our mountains have been eligible to fulfill the criteria to be designated as SAC is because of the way hill sheep farmers have been shepherding their sheep for generations.

Sheep farming is a low income sector and hill sheep farming is a very very low income sector and shepherding our mountains takes time and dedication and knowledge from both the sheep, the sheep farmer and also the farmers dog ,

Hill sheep farming is unique, our mountains are unique and indeed special places .

I fear if proper supports are not put in place and a proper payment of at least €35 / ewe is paid than our young farmers will not be able to afford to dedicate the time needed to shepherd our mountains and when that happens mountain fire will become common place

I would like to point out that on the mountains that have a proper stocking rate you will not have the huge destructive fires that are so devastating to our flora and fauna , (this is a fact .)

When a fire occurs the costs on emergency services is astronomical from a financial point of view but even greater are the costs on our biodiversity.

Therefore it is hugely important that hill sheep farmers receive €35/ ewe to keep them managing our Hills and mountains or otherwise we will suffer the consequences with our mountains becoming over grown and as sure as night follows day they will go on fire and our biodiversity will be devastated for miles .

I know there is a commonage management plan that sheep farmers must abide by to receive Glas payments but a targeted payment of €35 per hill ewe breed is essential in my view to make it worthwhile for farmers to be able to afford to keep farming these very environmentally sensitive areas of our country.

It is important that only mountain breeds are paid in this scheme that I am proposing.

I don't know what a measure like this would cost government but I am very sure that if this measure is not acted on the costs will be immeasurable, financially, socially and naturally

I will finish up by saying there is precedent from the ewe premium days of the 1990s for paying a higher rate per ewe in mountain areas compared to lowland areas.

I hope this environmental measure is acted on .

We have a moral duty as a proud nation to ensure we bring in the environmental measure.

Regards

[REDACTED]

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** Measures for inclusivity in next CAP  
**Date:** Thursday 2 December 2021 11:20:14

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Good morning,

I would like to outline my concerns in regard to the announced incentives for female farmers in the next CAP.

Women in farming have been historically overlooked when it comes to gaining access to land and in terms of being regarded as farm successors. These issues were also highlighted in the Department of Agriculture's own SWOT analysis. According to the CSO, just over 16,000 women - 12% of farmers - are head of a farm holding and yet the same figures show that some 70,000 women work on farms everyday - 40,000 of whom are spouses.

Addressing gender equality is a key tenet of the CAP legal text and Article 6 point (h), specifically refers to the need for Member States to ensure that female farmers are supported in the next CAP.

### **60% TAMS for women**

However, as outlined below, I have serious concerns regarding the recently announced 60% targeted agricultural mechanisation scheme (TAMS) grant for "qualified" female farmers.

The current criteria means that only women between 40 and 55 years of age can avail of the grant if they have at least a Level 6 degree in Agriculture. I understand that these measures have been put in to safeguard generational renewal and ensure that women are not added to farm partnerships as empty tokens.

However, according to the Department's own figures as shown below there just 5,576 women out of 19,853 potentially fit this age criteria and have access to the grant. It is also not known how many of these women have the required qualification to meet the criteria, thus potentially further cutting off the number of women who can avail of the grant.

I would ask the Department to consider:

- Less than 4% of TAMS funding went to women
- Just 3.8% of farms are registered in joint male/female names
- More women over 80 years of age are considered "actively" farming than those under 40



- The number of available places on Level 6 courses if there were an influx of women registering to join
- The repeated concerns of women in the age demographic that has been highlighted in regard to childcare demands and the need for flexible learning requirements.
- The fact that a number of older women who worked on farms now face old age without a pension because their PRSI stamps were not paid - some of these women were originally discriminated against due to the marriage bar.

<b>Age Band</b>	<b>Count (Male)</b>	<b>Count (Female)</b>
Between 18 and 24	479	107
Between 25 and 29	1719	285
Between 30 and 34	2979	520
Between 35 and 39	5444	928
Between 40 and 44	8428	1483
Between 45 and 49	11003	1884
Between 50 and 54	13260	2209
Between 55 and 59	14765	2411
Between 60 and 64	14362	2332
Between 65 and 69	12787	2160
Between 70 and 74	10724	1952
Between 75 and 79	7438	1425
Greater than or equal to 80	6724	2157
<b>Total:</b>	<b>110112</b>	<b>19853</b>

On the back of these considerations, I back the WASG recommendations that the Department should take on board when developing CAP plans.

- That women with at least a Level 6 in Agriculture **or who have been head of a farm holding for at least three years** qualify for the TAMS 60% grant. This marks the experience that the women have gained running their own holding and eliminates the possibility that women could be added as tokens in time for the grant to take effect in 2023.
- While the WASG respect the need for generational renewal the age limit for the 60% TAMS must be raised to the incoming pension age of 67 - this is vital in the context of ensuring that older women who are active on family farms are given the support to become equal partners before reaching pension age and avoid repeating mistakes of the past.
- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership - similar to the current partnership model where a young trained farmer joins.
- The need to ensure that an older generation of women begin to be seen as equal farm partners to ensure that younger women start to see the positive cultural change in farming and feel encouraged to take on farming as a career - thus helping

gender equality and generational renewal.

I would further ask the Department to consider that the meaningful cultural change that is needed in terms of addressing inclusivity in Irish farming requires flexibility and understanding of the unique issues that can impact women as farmers. I understand that criteria are necessary for any scheme but reducing, limiting and creating barriers to a scheme that is designed to support women undoes the goodwill and potential efficacy of a scheme before it has even started.

Many thanks.

Best regards,

██████████.



# Public Consultation on Ireland's draft CAP Strategic Plan 2023-2027

*Irish Organic Association, December 2021*

## Introduction

Ireland's CAP Strategic Plan 2023-2027 has huge potential to support organic sector development. The Irish Organic Association (IOA) welcomes that €256m of new Pillar II CAP support will be used to drive forward Ireland's organic farmland target. Clarity is needed on how synergies will be ensured between this new funding and the existing funds under the RDP 2014-2020 and EUIR up to 2025. **Key CAP interventions such as the organic farming scheme (OFS) and organic capital investment scheme (OCIS) as well as prioritisation under environmental schemes can play a pivotal role if designed appropriately to meet sector needs.** As the EU's only legally recognised seal of sustainability, certified organic farms and business are expected to deliver high quality produce and support viable livelihoods as well as proactively contribute to environmental and climate action, animal welfare and rural development (Sanders et al, 2013). This makes organics well-placed to support Ireland's sustainability goals. **However, to reach its full potential a comprehensive policy framework must be in place.** This includes enhancements to the organic-relevant interventions proposed in the draft Plan but also investments in **organic advisory and extension services** (see below). Interventions **that stimulate organic market development** to capitalise on consumer demand are also critical (see Box 1).

### *Mainstreaming equality and inclusion in the CAP*

The CAP can make an important contribution to ensure equality and inclusion are priority issues in the Irish agri-food sector, including gender, diversity and human rights. For instance, there should be no age restriction for women receiving a higher rate of aid under the Capital Investment Scheme, once the basic requirements expected of any farmer (irrespective of gender) are fulfilled e.g., active farmer definition. Furthermore, social conditionality requirements that assist the enforcement of Ireland's working and employment conditions and labour standards must be part of the Plan from the start.

This submission builds on previous IOA CAP proposals, setting out 12 priority recommendations below to further develop the options available for enabling the expansion of a dynamic, innovative and market-informed organic sector that works for farmers and society.

### **Box 1: Organic supply chain and market development**

Demand for organic produce continues to grow, with Ireland and its EU partners recording consecutive years of double-digit growth in grocery sales, doubling in value over the last 10 years. Not only is domestic demand increasing, but Ireland's four main export destinations - the UK, Germany, France and Italy - dominate European organic food retail sales (Willer et al, 2021). There are some interventions under the CAP that can help to support organic supply chain and market development namely the LEADER Programme and producer organisations (POs). For instance, the profile<sup>1</sup> of existing organic operators shows that prioritising the organic sector under the LEADER programme can help to diversify income streams and encourage more gender-balanced participation. In addition, the 'bio district' concept<sup>2</sup> should be strongly encouraged for inclusion in Local Development Strategies (LDS). While the draft Plan does make some reference to producer organisations (POs) supporting organic growers, further consideration is needed on the role of POs in professionalising market organisation and the bargaining power of organic farmers across different sub-sectors. At the same time, the CAP can only play a limited role and other policy measures are required. This is critical to exploit market opportunities, but also to respond to known or future barriers and bottlenecks facing the sector. Many of these issues are considered to some extent in the National Organic Strategy and Food Vision 2030 and are beyond the scope of the CAP. However, they need to be more clearly set out in the draft Plan in line with Ireland's identified needs (e.g., Obj2.N2, Obj3.N2 and Obj9.N4) and the European Commission's recommendations on Ireland's CAP Strategic Plan to promote not only the development of the organic farmland area but also the organic market - whether supported through the CAP or not.

<sup>1</sup> Over 18% of IOA farming members have on-farm processing, 32% of them are managed or owned by women. Furthermore, ~49% of IOA processing licensee holders are either managed and/or owned by women.

<sup>2</sup> Action 14 of new EU Organic Action Plan designed to reinforce local and small-volume processing and foster the short trade circuit

## Summary of Key Recommendations

### *Organic Farming Scheme*

1. Organic payment rates should reflect the full costs of organic production compared to farms representative of different sub-sectors. This is necessary to develop a sustainable organic farmland base and ensure a level playing field with other organic producers in the EU
2. Organic payment rate costings should take account of environmental payment rates where practices are overlapping with the organic standards. Organic payment rates should start with a deficit to represent these costings (e.g., SIM)
3. Payment rate differentiation should be reflective of the average or median-sized farm in different sub-sectors and not act as a disincentive to farmers wishing to convert or maintain farmland under organic management
4. Existing core requirements of the OFS should better reflect the realities and knowledge of organic farm and land management to support more effective sector development

### *Other Environmental Interventions*

5. A wide menu of options is necessary to reward existing sustainable farming practices, including organic management, and incentivise meaningful change in farming practices, driven by ecological needs rather than improving farm efficiencies, which are primarily business decisions
6. Misinterpretations of double funding between the OFS and certain actions under the AECM must be addressed to reward and incentivise organic farmers to deliver enhanced environmental and climate performance beyond the scope of the organic standards
7. Organic farmers should have priority access to the AECM cooperation option where they are located in a defined target area, whilst maintaining the choice to engage in the General AECM option if it is more appropriate for their farm enterprise
8. Farm Sustainability Plans (FSP) and AECM Training should be based on a whole-farm approach and cognisant of organic farming systems in Ireland. It should be designed to make the best of what each individual farm has to offer and where improvements can be made over time

### *On-farm Capital Investment Scheme*

9. A higher support rate to cover up 60% of eligible costs under the Organic Capital Investment Scheme, similar to other priority groups, would send a clearer signal of the Government's commitment to the development of organic food and farming systems

### *Farm Advisory Service/CPD for Advisors/Knowledge Transfer*

10. Targeted and tailored advisory and extension services are critical to support farmers interested to convert to organic production or who wish to make changes and/or improvements to their existing organic farm and land management

### *Protein Aid*

11. Incentives for protein production and combi cropping in particular, must better reflect the economic realities of organic production and environmental contribution that such systems can play in supporting greater food and feed autonomy

### *Small Farmer Scheme*

12. Support must be broadened for small-scale organic producers across different sub-sectors by establishing a small farmers scheme that recognises the important contribution of these producers to food production

## Detailed Overview of Key Recommendations by Intervention

### Organic Farming Scheme (OFS)

#### *Payment rates*

- 1. Organic payment rates should reflect the full costs of organic production compared to farms representative of different sub-sectors. This is necessary to develop a sustainable organic farmland base and ensure a level playing field with other organic producers in the EU**
  - Whilst the budget for the organic farming scheme (OFS) is proposed to increase substantially to support Ireland's organic farmland target, the payment rates for most sectors set out in the draft plan do not represent a significant increase and in some cases no increase at all.
  - Comparisons with conventional farms of "similar...intensity of production and efficiency" does not fully reward existing organic farmers' decisions not to intensify their production and offers limited incentive for "commercial" conventional farms to internalise the environmental costs.<sup>3</sup>
  - If payment rates do not fairly reflect the typical costs compared to other representative conventional Irish farms, Ireland will continue to have some of the lowest payment rates in the EU and be potentially at a competitive disadvantage to other EU organic producers<sup>4</sup>.
  
- 2. Organic payment rate costings should take account of environmental payment rates where practices are overlapping with the organic standards. Organic payment rates should start with a deficit to represent these costings (e.g., SIM)**
  - A key example is the straw incorporation measure (SIM) where farmers can receive up to €250/ha on the first 40 ha, whilst full symbol organic tillage farms would receive €190/ha for ≤ 20 ha or €170/ha between >20 ha and up to 60 ha (~30-47% less per ha)
  - This is despite organic farmers incorporating organic residues into their soil as a matter of good agronomic practice. This represents just one component of the range of different sustainable practices applied by organic tillage farmers compared to their conventional ones
  - The potential for premium prices notwithstanding, it is important to recognise that the OFS is a sustainable land management intervention contributing to several of Ireland's environmental objectives related to biodiversity, soil, water, air and climate etc.
  
- 3. Payment rate differentiation should be reflective of the average or median-sized farm in different sub-sectors and not act as a disincentive to farmers wishing to convert or maintain farmland under organic management**
  - While some Member States differentiate organic payments (e.g., based on land-use intensity, crop type and use), in contrast to Ireland very few have implemented a degressive payment model, whereby the payment level is based on the size of the organic area and frontloaded.
  - If this model is continued, it should be based on representative conventional farms especially in sectors with a deficit. For example, the upper rate of support for tillage should be increased to at least 60 ha as this is the average size of a tillage holding<sup>5</sup>

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<sup>3</sup> Rates should also be in line with the most recent representative costs possible (i.e., to account for changes in costs since 2013/2014).

<sup>4</sup> For example, conversion rates for tillage and grassland farms in Germany are up to €520/ha and €364/ha respectively, with maintenance rates up to €273/ha (albeit with regional variations). See Organic in Europe: Prospects & Developments for Organic in National CAP Strategic Plan. Brussels: IFOAM Organics Europe, based on Lampkin and Sanders (2021). Available at: [tinyurl.com/29uphezv](https://tinyurl.com/29uphezv)

<sup>5</sup> Based on the preliminary result of the Teagasc National Farm Survey 2020

- It is also important to remember that there is significant growth achievable in sectors that are considered to be potentially “over-represented”. The OFS must appropriately support these sectors, but other policy measures are also needed to address known bottlenecks<sup>6</sup>.

#### *Scheme core requirements*

#### **4. Existing core requirements of the OFS should better reflect the realities and knowledge of organic farm and land management to support more effective sector development**

- The continuation of many existing eligibility conditions of OFS including the prioritisation of total conversion over partial conversion, mixed farms and young farmers are welcomed to ensure the sustainable development of the sector
- While the completion of the NFQ Level 5 'Organic Farming Principles' course, should remain an eligibility condition, other education qualifications should also be recognised, where organic farmers demonstrate completion of a more advanced organic farming course<sup>7</sup>
- For farms with organic tillage, in particular, selection criteria need to take account of the 2-3-year fertility building phase for organic arable enterprises with farmers permitted to declare nitrogen-fixing crops such as clover and vetch in grass leys as part of their arable rotation.<sup>8</sup>

#### Other Environmental interventions

#### *Eco-scheme*

#### **5. A wide menu of options is necessary to reward existing sustainable farming practices, including organic management, and incentivise meaningful change in farming practices, driven by ecological needs rather than improving farm efficiencies, which are primarily business decisions**

- Of the 10 eco-scheme options proposed, 7-8 of them with the right conditions could be appropriate for organic farmers (i.e., non-productive area landscape features, extensive livestock production<sup>9</sup> and planting native trees/hedgerows)
- Regrettably, there is no focus on incorporating basic biological nitrogen fixation into grassland or perennial farming systems (as an alternative to the Limiting Chemical Nitrogen Input option). This is an option, where farmers would be rewarded for growing a perennial forage legume<sup>10</sup>
- Such an option not only rewards innovative farmers (both organic<sup>11</sup> and conventional) and incentivises late adopters, but also offers a much clearer pathway for farmers to improve, whilst indirectly optimising efficiencies and reducing costs.<sup>12</sup>

<sup>6</sup> Key examples include leakage into the conventional supply chain, disconnect between organic suckler farmers and beef finishers and/or market opportunities in the organic sheep sector, including regionally-differentiated meat produce and wool for high-end textiles

<sup>7</sup> This should include well-known courses accredited under the European Qualifications Framework – EQF such as the Organic Farming MSC awarded by SRUC/University of Glasgow (NFQ level 9) as well as new qualifications such as the BSc in Organic Agriculture (NFQ level 8) being established by the South East Institutes of Technology in Carlow and Waterford.

<sup>8</sup> This may require recognition of these crops under the basic direct payment application, before organic cropping is cross-checked with an organic farmer’s OFS application.

<sup>9</sup> Max. stocking rates should really be based on farmland, soil type, catchment area needs

<sup>10</sup> It could include improving existing swards as well as undertaking a full re-seed. In addition, it would allow farmers to apply basic legume mixes before potentially adopting a more advanced MSL action (as originally proposed under the AECM)

<sup>11</sup> The cultivation of perennial legumes e.g., red or white clover may represent good organic practice, but is not a specific requirement of the organic standards

<sup>12</sup> Other options could include the development of a nutrient management and budgeting plan (monitoring inputs and outputs), beekeeping for biodiversity (farmer/beekeeper collaboration), development/updating of NPWS Farm Plan

**6. Misinterpretations of double funding between the OFS and certain actions under the AECM must be addressed to reward and incentivise organic farmers to deliver enhanced environmental and climate performance beyond the scope of the organic standards**

- While organic farmers are proposed to be prioritised under Tier 1 of the General AECM, based on current double funding interpretations we foresee organic farmers **could** be considered ineligible for almost half of the actions proposed where combined with OFS
- Current exclusions not only undermine the ability of organic farmers to further enhance their overall sustainability credentials but often make the OFS unattractive compared to the AECM and sends mixed messages to farmers who are well-placed to address key goals and targets
- Our own analysis found that the majority of AECM actions<sup>13</sup> proposed could be combined with the OFS and are not double funding if organic land management assumptions are considered as part of the requirements and costings where applicable (see Box 2 for three key examples).

**Box 2: Selected examples of AECM action/OFS double funding concerns**

- a. Low-input grassland/sustainable grazed pasture (MSL) (results-based): Taking REAP as a reference point, none of the scheme indicators used to determine these results-based payments (e.g., number of species in the sward, boundary features etc) are specific requirements of the organic standards. While double funding issues could arise with regards to costings based solely on conventional farming assumptions, this demonstrates the need to consider the requirements necessary to reach the desired objective of the action in an organic context. For example, taking into account the cost of limiting slurry and farmyard manure applications under the low-input grassland action, and/or the costs associated with establishing and maintaining an organically managed multi-species ley (MSL) under the MSL action. These observations are also relevant to other grassland actions.
- b. Winter Bird Food (margin or whole field) and Conservation of farmland birds (various): Currently none of the farmland bird-related actions under GLAS (except for bird boxes) are eligible for organic farmers participating in the OFS. The reasons why these actions are considered ineligible remain unclear to us given the potential synergies with the OFS. Firstly, the conservation of specific farmland bird species is driven by the needs of Ireland's commitments under the Birds Directive and not the organic regulations. Secondly for wild bird cover, if an organic farmer was eligible to combine this action with the OFS, in addition to maintaining the relevant parcel under organic management (via OFS), the farmer would be paid for additional costs incurred for providing winter feed for birds. These establishment and maintenance costs are also beyond the scope of the organic standards. Furthermore, engaging in such actions also incurs income forgone as a result of yield reductions.
- c. Tree planting – Rows, Groups or Parkland: Our interpretation is that this action is designed (alongside the proposed eco-scheme option) to better integrate trees into the farmed landscape including the development of agroforestry systems (which have been pioneered by organic farmers). We also understand that the aim is to ensure better synergies between the new agri-environment-climate scheme and the forthcoming National Forestry Programme. However, our previous experience with forestry measures and CAP, is that organic farmers cannot receive the OFS on parcels that have trees planted despite remaining designated farmland areas. Therefore, we want to ensure that these issues are addressed (as well in the eco-scheme) to avoid organic farmers being penalised for improving the environmental value of their farmland, whilst at the same time maintaining or enhancing productivity.

**7. Organic farmers should have priority access to the AECM cooperation option where they are located in a defined target area, whilst maintaining the choice to engage in the General AECM option if it is more appropriate for their farm enterprise**

- Organic farming systems are well-placed to support EU and national priorities such as those linked to the Water Framework and Birds and Habitats Directives as they can build on their existing environmental credentials and take a whole-farm approach to land management

<sup>13</sup> This includes non-productive investments associated with specific AECM actions

- Under the EIP-AGRI, organic farmers have engaged in many results-based co-operation projects, alongside conventional farmers such as the Burren Programme, Hen Harrier project and Protecting Farmland Pollinators demonstrating their interest in the approach
- More details are needed on the location of the proposed 'defined priority geographical areas' and ranking of environmental and climate issues to be addressed as well as how the 8 CP teams will be established, including possible synergies/continuation of existing EIPs

**8. Farm Sustainability Plans (FSP) and AECM Training should be based on a whole-farm approach and cognisant of organic farming systems in Ireland. It should be designed to make the best of what each individual farm has to offer and where improvements can be made over time**

- We strongly recommend that both the FSP and AECM Training are designed to consider multiple, rather than individual sustainability issues<sup>14</sup> irrespective of the AECM selection. This should encourage farmers to consider these issues as part of their overall enterprise
- As a priority sector under AECM, training must appropriately cater for organic farming systems. Training<sup>15</sup> for all farmers should ideally be targeted and tailored to the specific actions with the FSP used as a living document to support sustainability improvements
- As an original proponent of the FSP concept, the Irish Organic Association welcomes the opportunity to put forward proposals for how the FSP and AECM training could work for organic farming systems in practice based on further details of what is proposed

On-farm Capital Investment Scheme

**9. A higher support rate to cover up 60% of eligible costs under the Organic Capital Investment Scheme, similar to other priority groups, would send a clearer signal of the Government's commitment to the development of organic food and farming systems**

- While the Irish Organic Association welcomes the proposal to increase the OCIS aid rate to 50% of eligible costs given that the transition and improvements in organic farming can incur significant costs, the higher 60% rate would be more appropriate
- The eligible list of investments and reference costs should be reviewed annually and updated regularly to account for evolving needs and new technologies relevant to different organic sub-sectors and the rate of inflation concerning costs
- As well as horticulture producers it is important to ensure that smaller-scale organic farmers such as pigs and poultry producers can avail of grants under the OCIS and therefore, they should be exempt from the 5ha threshold as well<sup>16</sup>

Farm Advisory Service/CPD for Advisors/Knowledge Transfer

**10. Targeted and tailored advisory and extension services are critical to support farmers interested to convert to organic production or who wish to make changes and/or improvements to their existing organic farm and land management**

- Despite the Food Vision 2020 and the National Organic Strategy highlighting the need to increase organic farming expertise amongst advisors, no provision for organic advisory and extension services, including relevant CPD is evident in the draft Plan<sup>17</sup>

<sup>14</sup> This should include objectives concerning climate change, biodiversity and habitat protection, water, soil, air quality and energy consumption, taking account of different land-use types and farming systems (conventional and organic)

<sup>15</sup> The two training courses should include both class- and field-based components that allow both trainers, advisors and farmers to focus on the actual achievement of environmental and climate goals.

<sup>16</sup> Based on demonstrating they are a holder of an active sub-sector or department identifier and have an organic license

<sup>17</sup> During the most recent tranche of the organic farming scheme (March-April 2021) the lack of advisory services to support conversion planning was regularly mentioned as a barrier to conversion.

- While the DAFM has published a draft list of advisors, it is essential that core expertise are demonstratable<sup>18</sup> and that a target is set to increase the number of FAS accredited advisors and supported by an appropriate CAP spend<sup>19</sup>, in line with sector targets and growth trends
- The KT programme must be tailored to the needs of new and existing organic farmers and a minimum percentage of the KT group tenders should be representative of the organic target and growth trends, with organic farm and land management designated a 'Priority KT Topic'.

## Protein Aid

### **11. Incentives for protein production and combi cropping in particular, must better reflect the economic realities of organic production and environmental contribution that such systems can play in supporting greater food and feed autonomy**

- Protein aid is also relevant to the sustainable expansion of the organic livestock sector where there is an insufficient supply of organic home-grown proteins. Payment rates should take account of organic protein imports and the wider environmental benefits of combi-cropping
- Care must be taken to ensure the species proportions (e.g., protein crop being at least 50% of the seeding rate) do not undermine the possibilities for farmers to make agronomically and environmental sound choices e.g., sowing a diverse range of species, undersowing leys
- There are also potential opportunities for producing proteins including legumes for human consumption. Such support should be targeted at supporting innovative production of other protein crops which are grown at a small scale (i.e., not only limited to peas, beans and lupins).

## Small Farmer Scheme

### **12. Support must be broadened for small-scale organic producers across different sub-sectors by establishing a small farmers scheme that recognises the important contribution of these producers to food production**

- While the National Organic Strategy highlights the role of small-scale producers in supporting viable farm livelihoods, the Food Vision 2030 also intends to develop small-scale market garden enterprises, including organic, via a new roadmap for the horticulture industry
- Small scale organic producers (e.g., operating under 1-3 hectares) should have the option of applying to a small farmer scheme as a more simplified form of income support than other decoupled direct payments
- Currently, 15 Member States in the EU have implemented a small farmers scheme, with payments of up to €1250 per annum possible. Such an option should not exclude new entrants from availing of relevant young farmer interventions

## References

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

Sanders, J. (ed.) 2013: Evaluation of the EU legislation on organic farming. Braunschweig: Thünen Institute of Farm Economics.

Willer, H et al., (2021) eds. The World of Organic Agriculture 2021: Statistics and Emerging Trends. Frick/Bonn. FiBL/IFOAM Organics International

<sup>18</sup> Based on the completion of the 'Organic Farming Principles' course tailored to advisors (at a minimum), another organic qualification (e.g., NFQ Level 8-9 or EQF Level 6 or 7 equivalent) or relevant professional experience (where applicable)

<sup>19</sup> In addition to the new funds, €20m was earmarked for agri-environment training for farmers and €4m for CPD for advisors ahead of the new CSP 2023-2027, some of which should adequately targeted at the organic sector



**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Subject:** CAP plans  
**Date:** Thursday 2 December 2021 17:29:32

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Good afternoon,

I back the WASG recommendations that the Department should take on board when developing CAP plans.

- That women with at least a Level 6 in Agriculture or who have been head of a farm holding for at least three years qualify for the TAMS 60% grant.
- The 60% TAMS age limit must be raised to the incoming pension age of 67 - this is vital in the context of ensuring that older women who are active on family farms are given the support to become equal partners before reaching pension age and avoid repeating mistakes of the past.
- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

[REDACTED]

Sent from my Huawei phone

**From:** [REDACTED]  
**To:** [CAP Strategic Plan](#)  
**Cc:** [REDACTED]  
**Subject:** Submission to consultation - draft CAP Strategic Plan  
**Date:** Friday 3 December 2021 10:45:00  
**Attachments:** [Irish Orchards](#), [REDACTED]

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Dear Sir or Madam,

I wish to make a submission in relation to the draft CAP Strategic Plan, for which the closing date is Wednesday December 8<sup>th</sup>, 2021.

This submission is on behalf of the Irish Apple Growers Association, [REDACTED]

Please note that following a call with [REDACTED] this morning, I am cc'ing her into this submission.

There are some major issues with the strategic plan 2023-2027 in relation to the potential effects on apple growers, and producers of similar orchard crops at smaller scale (e.g. plums & pears).

Pillar 1.

25% payment under Pillar 1 is for eco schemes. However, it is not clear that the items listed under Pillar 1 are accessible to apple growers. While it is clear that horticultural producers were not specifically considered when creating the list of proposed agricultural practices, it is probable that of the five proposed agricultural practices, two of the four listed below would probably be suitable for apple growers as follows:

1. Space for nature
3. Limiting Chemical Nitrogen Usage
4. Planting of Native Trees
5. Use of a GPS controlled fertiliser spreader

It is really important that apple growers (and I assume other producers of horticultural products) be able to access this Pillar 1 Eco scheme. In addition, I would suggest adding Alders to the list of native trees that can be planted as they are suitable accompanying trees for orchards.

Pillar 2.

As growers we missed out on GLAS, and ten years potential environmental payments, due

to carelessness when designing the scheme, and are adamant that this should not happen again. Apples are the only food producing land use in Ireland which is net carbon sequestering, at a rate of about 11t CO2 per hectare per year, and it only right that the contribution of the sector is recognised and rewarded in Pillar 2. For details on the verification of carbon sequestration in orchards please see attached report.

The comments below are in relation to the Dept of Agriculture publication: “Ireland’s Summary of the Draft CAP Strategic Plan 2023-2027). Suggestions for amendments to the existing text are highlighted in red.

Tier 1 PEA:

Unfortunately I would not foresee apple growers fitting into Tier 1 PEA because of the restrictive nature of the section.

Tier 2 PEA:

Apple growers should be able to qualify in some way here. I would suggest amending to the 5<sup>th</sup> line (second box on page 31, summary ), where it says “Has more than 30ha of arable crops” to “Has more than 30ha of arable crops or 5ha of orchards”.

And then add to the mandatory actions of minimum tillage, catch crops and winter bird food, “mulch incorporation of orchard prunings”.

Also at the box at the bottom of the page 31, given that orchards are trees, I believe we should have recognition of the planting of orchards as a tree planting action. So something like:

An applicant may also be considered under Tier 2 if he/she adopts at least one of the following tree planting actions:

“Planting of commercial orchards”

Tier 3 General actions:

It is important that orchards should not be left out here. Either orchards need to be classified along with arable land, or specified by themselves:

E.g. Page 32:

Line 5: Actions Suitable for Arable land/temporary grassland and orchards

Line 14: Actions Suitable for grassland and orchards

Lines 32 and 33 (Resource protection actions):

Riparian buffer strip Arable/Grassland/Orchard

Riparian buffer zone Arable/Grassland/Orchard

There should also be a specific action in Tier 2 or Tier 3, (results based) on carbon sequestration in orchard soils. Research published in Ireland has shown carbon sequestration of about 11 tonnes CO2 per ha per annum in orchard soils, and a results based measure should be included to allow apple growers to get credit for this sequestration.

If there is not a specific measure put into Tier 2/Tier 3 for this, then a specific measure such as the straw incorporation measure needs to be implemented.

It goes without saying that growers should also be able to and encouraged to join any cooperative AECM in their areas.

Many thanks for the opportunity to submit:

[REDACTED]

[REDACTED] Irish Apple Growers Association

[REDACTED]

[REDACTED]

[REDACTED]

<<...>>

# **Carbon sequestration in Irish orchards and potential for offsetting CO<sup>2</sup> emissions.**

Report by [REDACTED]

[REDACTED] University of Limerick, Ireland.

## Summary:

Carbon sequestration in orchards has significant potential to mitigate Ireland's CO<sub>2</sub> emissions.

Long-term sequestration in orchards is due to increments in the mass of plant structural wood each year, and increases in soil organic carbon (SOC) in the orchard soils.

There is also short-term sequestration, principally the carbon sequestered in the fruits produced in a particular year. Short-term sequestration is not generally considered as useful from the perspective of emissions mitigation, and is not considered mitigating in this report.

Allowing for carbon inputs such as fuel and fertiliser in the growing cycle, an orchard studied in Ireland had a net annual sequestration of 3.1t C/ha/yr., equivalent to 11.4t CO<sub>2</sub> per ha per year.

In comparison with international research, this is less than reported in some countries, and more than in others. Because many factors contribute to net sequestration, figures will vary internationally, and even within a particular country.

Sequestration in orchards, at 11.4t CO<sub>2</sub> per ha per year compares closely with forestry planted in Ireland since 1990, which over the four year period 2008-2012 had a net sequestration of 14.2 tonnes CO<sub>2</sub> per ha per year.

Research conducted on orchard soils in Ireland shows that they have significant capacity to sequester carbon, and compare favourably in this regard with, for instance, permanent pasture.

## Carbon sequestration in Irish orchards and potential for offsetting CO<sup>2</sup> emissions.

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## Introduction:

Orchards represent a potential carbon sink for absorbance of atmospheric CO<sub>2</sub>, and work has been conducted around the world to begin to evaluate their potential (Lakso 2010, Guo et al. 2013, Anthony 2013). The principle areas of sequestration are fruits, plant structural wood above and below ground, and via increases in soil organic carbon (SOC) or the total soil carbon content over the lifespan of the orchard (Zanotelli et al. 2013). In operating orchards, CO<sub>2</sub> is also released to the atmosphere, due to natural respiration and turnover of soil carbon (Wu et al. 2012), and also due to the use of fossil fuels, agrochemicals, fertiliser and other inputs in the production cycle (Kizilaslan 2009, Saunders 2006).

## Literature Review:

### Studies in the USA:

Atucha et al (2011) quantified the dry weight allocation to above ground and below ground parts of a typical 9 year old apple tree growing on an old orchard site in New York State. The trees (560/ha) on M111/M9 interstem combination had 2/3 of their biomass above ground and 1/3 underground.

The mean SOC (0-20cm) from 1992 to 2000 was 2.4% while the mean SOC (0-20cm) from measurements taken in the same orchard in 2005, 2006 and 2007 was 2.9% (based on a conversion figure of 1.7:1 SOM to SOC). This was equivalent to a ten year increase of 0.5% SOC (1996-2006). Depending on BD (not given) this would be approximately 10-12 t/ha increase or 1 to 1.2t/ha increase per annum.

The average per tree below ground dry weight was 7kg and above ground was 15kg, or 3920 and 8400 kg/ha respectively. At a conversion of 2.2:1 this is equivalent to 1780kg C below ground and 3820kg per ha C above ground, or an accumulation of 178kg and 382kg C per ha per year respectively.

In a trial on apple orchards in New York State, Leinfelder et al (2010) reported that over the course of 17 years, the soil organic matter doubled from 4.5% to 9%, equivalent to a soil organic carbon increase from 2.6% to 5.2%, or 0.15% per annum on average, triple the rate reported by Atucha et al (2011).

A further report from New York state stated that dry matter increment per annum in apple orchards was 18.6 tons per hectare (excluding an additional 13.9t/ha for grass alleyways and herb/weed cover in orchards). This was made up of 6.25t/ha attributed to the apple crop, 5.0t/ha for leaves, 5.0t/ha for wood and 2.5t/ha for roots. This was equivalent to 7.8t/ha C annually (excluding 5.8 tons grass alleyway etc.), 2.6t C fruit 2.1t C leaves, 2.1t C wood and 1 t C roots (Lakso 2010). This report did not attempt to quantify soil sequestration.

TerAvest (2011) reported on an apple orchard (on M7 at 1541 trees per ha) planted in the Wenatchee Valley of Washington State in 2005, the land having previously been cropped with cherry trees. Analyses were carried out in September 2007 and 2009 on the soil carbon, which increased from 10 to 14.9g C per kg of soil in the top 10cm profile, or 0.5% over the two years.

Mays et al (2014) studied an organically managed orchard planted in the Ozark Highlands area of Arkansas in 2006, planted on M26 rootstock at 1485 trees per hectare, with a fescue grass strip between the tree rows. In October 2006 SOC was measured in the top 10cm of the soil profile, and this was repeated in March 2012. Depending on the soil and groundcover management employed, the soil C sequestration rate varied from 0.9 to 2.8 tons/ha/yr. of C, a rate up to 21 times greater than reported over the same 6 year period for a native tallgrass prairie in the same area.

### Studies in Japan:

Using data from a rolling national survey conducted in Japan from 1979 to 1998, Leon et al (2015) reported on soil organic carbon changes in orchards of apples, oranges, peaches and pears, as well as tea gardens. In general warmer sites had soils with lower carbon contents. The average increase over the 20 years was 0.2% per annum, which in the soils with lower starting SOC was equivalent to a doubling, and in soils with the highest starting SOC, going from 89 to 132 g C per kg soil.

Sekikawa (2005) also reported on soil carbon and net primary productivity of orchards in Japan. For peach orchards the measured SOC to 1m depth was 66.3t/ha. The biomass C was measured at 18.5t/ha. The net primary productivity of the trees was 4.7t C/ha/yr. and that of the orchard was 11t C/ha/yr., a value according to the author, "equal to the highest value in temperate forests". Net soil C sequestration on an annual basis was 5.9t/ha and net ecosystem productivity (net soil sequestration plus incremental growth) was 7.35t/ha/yr.

### Study in Bhutan:

The carbon stocks in orchard soils of the Paro Valley in Bhutan (Eastern Himalayas – altitude 1700 to 5500m) were measured (Dorji et al. 2014). In area sections measuring 8100m<sup>2</sup> the SOC stocks were as follows:

Depth	T/8100m <sup>2</sup> SOC	Equivalent T/ha SOC
0-5cm	12.3	15.2
5-15cm	22.4	27.7
15-30cm	22.1	27.3
30-60cm	22.2	27.4
60-100cm	28.6	35.3
Total	107.6	132.9

### Study in Korea:

Lee et al (2013) reported findings for a fifteen year old pear orchard in Korea, planted at 670 trees per hectare. Carbon in the top 60cm of soil profile was measured at 138.3t/ha. Carbon in trees totalled 17.7t/ha, made up on a per tree basis of 2.3kg trunk, 6.4kg main branches, 6.4kg lateral branches, 6.5kg roots, 1.7kg leaves and 6.7kg fruits, equivalent to 10 tons per ha C in above ground woody mass, 4.4 tons per ha in roots, and 3.3 tons in leaves and fruits.

### **Studies in New Zealand:**

A report reviewed a number of publications in an attempt to quantify the standing biomass of orchards in New Zealand. Because this work was confined to orchards similar to those in New Zealand, the authors did not assess data for soil sequestration. Their estimate for total standing dry weight for an apple orchard was 36t/ha, which they calculated was equivalent to 18t/ha sequestered carbon in the standing above-ground plant biomass (Kerckhoffs 2007).

Another research study was undertaken to quantify total sequestration of carbon and also to quantify emissions directly from the orchard soil, as well as emissions due to the production inputs associated with fruit production (Page 2011). For apples in New Zealand the total annual sequestration figure was 7.1 tons of carbon per hectare. Soil emissions were 4.5 tons of carbon per hectare per year, and emissions due to orchard inputs were 1.3 tons per hectare per year, indicating a net sequestration of 1.3 tons C per hectare per year.

### **Studies in China:**

In work on fruit ecosystems in Shanghai, China Guo et al (2013) found that for peach orchards carbon storage was 118t/ha, made up of 15.8t in tree biomass, 1.2t cover crop on orchard floor, and 101.3t/ha in soils. The net productivity reported was 4.9t C/ha/yr. (Guo et al. 2013).

Also in China, Song et al (2014) reported on response ratios in soil organic carbon due to the conversion of cropland to forest and orchard. In the 0-20 cm layer SOC increased by almost 1/3 in 14 years, and by 1/10 in the 20-40cm and 40-60cm soil layers (Song et al. 2014).

Wu and colleagues examined sequestration in orchards of different ages in China. Taking orchards of 5, 18 and 22 years of age into account, the average annual sequestration was calculated as 14t C/ha/yr., equivalent to 4.5% of the total net C sink in terrestrial ecosystems in China (Wu et al. 2012)

Hu et al (2014) compared carbon storage in orchard ecosystems and evergreen broad-leaved forests in Guangzhou, China. Vegetative C storage in orchards was 77.2 t C/ha/yr., with orchard soils storing 83.1 t/ha (56% in top 40cm, 44% in next 60cm). Comparing orchards with climax zonal vegetation, carbon storage in the upper 40cm of soil was 67% that of forests (Hu et al. 2014).

### **Study in Italy:**

A study on orchards in the Sud Tyrol region of Italy reported very high carbon use efficiencies (Zanotelli et al. 2013). The SOC in the top 60cm of the soil profile was 128t/ha. In addition, the tree biomass carbon for the 11 year old trees measured in 2009 was 12t/ha, with 72% accounted for by above ground biomass, and 28% below the ground. In this very productive orchard about 50% of the carbon sequestered was allocated to fruit in 2009. The carbon use efficiency figure of 0.71 reported for this orchard was said to be of "a comparable magnitude with respect to deciduous forests growing in similar climatic conditions".

### Studies in Ireland:

In 2009 samples of soil from an orchard soil in Co. Tipperary which had been in situ since 1985 were taken for analysis (Greaney 2009). Prior to that the field was in tillage since about 1970, having been tilled annually.

Depth	BD (g/cm <sup>3</sup> )	Mass of soil per depth (t/m <sup>2</sup> )	Mass of soil (t/ha) for this 5cm	SOC %	SOC (t/ha)	Litter (t/ha)
0-5	0.84	0.04	420	7.64	32.1	0.99
5-10	1.09	0.05	545	5.87	32.0	
10-15	1.03	0.05	515	5.32	27.4	
15-20	1.18	0.06	590	4.15	24.5	

Excluding litter, the total SOC in the top 20cm of soil profile was 116t.

In 2013 Moriarty conducted a trial to establish baseline levels of soil organic carbon in an orchard which was newly planted in that year, adjacent to that tested by Greaney. The land used for the orchard had been planted in grass the year previously, and prior to that had been in fallow with a wild vegetation cover for two years, while prior to that had mostly been tilled annually for a number of years and had also been used to grow strawberries, which meant it had been untilled for a 4 year period (Moriarty 2014). As such the %SOC in the baseline was probably higher than would be expected in a typical tillage field, but lower than in permanent pasture.

Depth	BD (g/cm <sup>3</sup> )	Mass of soil per depth (t/m <sup>2</sup> )	Mass of soil (t/ha) for this 5cm	SOC %	SOC (t/ha)
0-5	1.25	0.0625	625	3.12	19.5
5-10	1.25	0.0625	625	3.07	19.2
10-15	1.28	0.064	640	2.97	19.0
15-20	1.21	0.061	610	2.82	17.2
20-25	1.35	0.067	670	2.56	17.2
25-30	1.38	0.069	690	2.09	14.4

Because the data collected by Moriarty and Greaney are from two orchards in the same field, but with these orchards planted at different times, it is possible to use Moriarty's figures as a baseline, and to compare the figures reported by Greaney with them. Moriarty's figures were recorded in the first year that particular orchard was planted, and in the top 20cm of soil profile the SOC was 74.9t/ha. In an orchard which was 23 years old, Greaney found that in the top 20cm of soil profile the SOC was 116t/ha. This is equivalent to an annual soil C increase (in top 20cm) of 1.8t per ha per annum over the 23 years.

In addition, work conducted by this author in 2009 sought to quantify the carbon sequestered in the more permanent above-ground tree structure of the 23 year old orchard sampled by Greaney. After

pruning, two trees were removed from the orchard by cutting at soil level, and weighed. The average above ground mass was 36kg. A sub-sample revealed that the moisture content was 31%, so the above ground dry weight was 24.8kg. Based on the conversion in Table 4 below this is 11.3kg C per tree C. Over the 23 years this is equivalent to 0.5kg per tree per year of about 1200kg per ha per year.

#### Other relevant work:

(Kizilaslan 2009) measured energy inputs into production of apples in Turkey. The total energy input bearing in mind agrochemical inputs, fertiliser inputs, labour, machinery write-down, diesel, electricity and irrigation water was 4.1MJ per m<sup>2</sup> on an annualised basis. Based on a yield of 4.5 kg per m<sup>2</sup> this worked out at 0.91MJ per kg of fruit. This is quite similar to the 0.95MJ per kg reported by for New Zealand grown apples (Saunders 2006), which in this case equated to 60.1kg of CO<sub>2</sub> emissions per tonne of apples, or 16.4 kg of C emissions per tonne of apples.

The figures of Page (2011) and Saunders (2006) actually agree quite closely as at a yield of 50t/ha, as Saunders and her colleagues assumed in her work, the figures indicate a per hectare emission of 820 kg of carbon, not so far removed from the 1300kg calculated by Page.

Also of relevance is C saturation in soils, and how in different land use scenarios, saturation levels are different, with forest soils showing the highest saturation levels, and continuously tilled soils the lowest (Kimetu et al. 2009). Stewart et al, also working on measuring soil C saturation found that more degraded soils had better potential for extra C accumulation than soils already high in carbon (Stewart et al. 2008).

#### Conversion Figures Used:

In the course of the review above a number of conversion figures had to be used in order to make data comparable. For instance, in some publications soil organic matter was reported, whereas in others, soil carbon was the unit used. The conversion figures used (and their origin) are given in table 4 below:

Conversion	Conversion applied	Authority
Soil Organic Matter % : Soil Organic Carbon %	1.7:1	Spink
CO <sub>2</sub> :C	3.67:1	Based on atomic mass
Dry Weight apple tree woody tissue: C content	2.2:1	Wu, Zanutelli
Dry Weight apple tree leaf tissue: C content	2.1:1	Zanutelli
Dry Weight apple fruit tissue: C content	2.5:1	Zanutelli
Dry Weight apple tree fine roots: C content	2.25:1	Zanutelli

## Discussion of highlighted literature:

### Carbon sequestration by fruits:

Sequestration by fruits differed between studies where this was reported. For New York (Lakso, 2010) the figure of 2.6t C per ha per year was given. In Korea (Lee et al, 2013) a figure of 1.9 t per ha per year was reported. In Italy (Zantonelli et al 2013) a higher figure of 4.7t per ha per year was reported, but this was for an extremely high yielding orchard, which meant the figure was much elevated.

While no data were presented for Ireland, on the basis of a typical crop of 40t/ha, at a dry weight of 16.5%, carbon sequestration in fruits would be 2.6t/ha.

Although these are significant figures, it is generally felt that carbon sequestered in fruits should not be considered as permanently sequestered, as the majority is emitted back to the atmosphere upon consumption of the fruits.

Therefore for the purpose of this report, no sequestration will be attributed to fruits.

### Carbon sequestration by plant structural wood:

Sequestration in plant structural wood is longer-term than in fruits. In forest timber, sequestration could be considered more permanent if, for example, wood is subsequently used as a building material. Nonetheless, wood from forests is also used as a “carbon-neutral” fuel source, and wood from orchards at the end of their productive lifespans is typically used for the same purpose, and can be considered accordingly.

In the reviewed literature carbon in structural wood is reported for trees of different ages and species. In Ireland apple orchards tend to be left in situ for longer than in the examples reported, which would mean higher levels of sequestered carbon both in total, and on an annual basis if averaged over the longer orchard lifespan. In addition, most cider apple orchards have larger trees than culinary or dessert orchards which represent the tree type reported on, so these would also have higher levels of sequestered carbon, something that would warrant further study to quantify.

In general reports of the carbon sequestered above and below ground indicated that about 2/3 of the total was attributable to above-ground biomass and 1/3 to below-ground biomass (Atucha et al, 2011; Lakso 2010 and Lee et al, 2013).

There were quite a few publications which gave total biomass carbon data, but were not specific as to the age of the trees studied. Therefore it was decided to focus only on data which stated the annual increments or average sequestration over a given period.

Sequestered carbon on a per annum basis was variously measured as an annual average of 0.6 t/ha/yr. for 10 year old trees, (Atucha et al, 2011), 1.0t/ha/yr. for 15 year old trees (Lee et al, 2013), 1.1t/ha/yr. for 11 year old trees (Zantonelli et al, 2013) and 3.1t/ha/yr. for trees whose age was not stated (Lakso, 2010). A figure calculated for a 23 year old dessert apple orchard in Ireland in 2009 was 1.2t C per ha/yr. for above-ground biomass, and based on this a further 0.6t C per ha/yr. could be attributed to below-ground biomass accumulation, making the total 1.8t C per ha per year.

## Carbon sequestration in orchard soils:

### *Total sequestration:*

Sequestration in soils has the capacity to keep large amounts of carbon dioxide out of the atmosphere on a long-term basis. Different soils have different saturation capacities with regard to soil carbon, depending on soil type, climate, and land use. Forest soils are considered to be those with the highest saturation capacity. Orchard soils, because fruit trees are essentially managed mini-forests, also offer significant sequestration capacity, with, for example Hu et al (2014) reporting orchard soils holding about 2/3 of the amount of carbon in the top 40cm of soil profile when compared with evergreen broad-leafed forest soils in the same area.

In the same way that saturation figures vary, soil sequestration figures for orchards depend on climate and location, soil type, orchard age, as well as orchard management. Reported total SOC figures are given in Table 5 below:

Country	Orchard Crop	Orchard Age (years)	Reported by	SOC (t/ha)	Measured to depth (cm)
Bhutan	Apple	Mixed	Dorji et al	132.9	100
Korea	Pear	15	Lee et al	138.3	60
China	Peach	Mixed	Guo et al	101.3	100
China	Various	Mixed	Hu et al	83.1	100
Japan	Peach	Not stated	Sekikawa	66.3	100
Italy	Apple	11	Zantonelli et al	128.0	60
Ireland	Apple	23	Greaney	116.0	20

Orchard soils Worldwide were found to hold substantial reserves of carbon. Figures for soils in an Irish orchard were broadly in line with figures reported for other countries. Unfortunately the SOC for the 23 year old Irish orchard was only measured to 20cm deep, giving a significant underestimate of the total SOC. A simple proportionate addition for the SOC expected in the 20-30cm soil profile as per the results reported by Moriarty would suggest a total SOC in the top 30cm of soil of about 165 t/ha. While further carbon would be stored deeper in the soil profile, since no research was conducted to quantify this, it will not be included in calculating sequestration figures.

While this figure is higher than any of the other reported figures in the studies on orchards, it is not particularly surprising. It is much lower than the figure attributed to forest soils in Ireland (approx. 450t/ha). However, it is worth bearing in mind that this figure includes peat soils, and that typical figures for SOC under forestry in mineral soils range from 100 to 140t/ha in the top 30cm of soil profile (Black et al. 2014). Areas of greater rainfall have higher SOC than areas of lower SOC, and, for instance, precipitation in Ireland exceeds that in Italy, where the reported figure was 128t/ha. Areas with moderate average soil temperatures (around 11°C) show reduced respiration, and consequently greater net accumulation of carbon in soils, than, for instance areas with soils temperatures of 15°C, where respiration rates were much higher. The average annual soil temperature at 10cm deep in the region of Ireland where the orchards was studied is 11°C, which is helpful from the perspective of reducing soil respiration, and is considerable lower than, for instance, Korea, where soil temperatures in fruit growing areas are higher. Lastly, soils with higher



clay contents support higher SOC than soils with lower clay content, and the soil in the orchard in question in Tipperary has relatively high clay content in the range 30-40%.

### **Annual net sequestration to soil:**

While it is interesting to know total SOC, what is of greater use is an assessment of annual C sequestration where a particular crop is grown. This is a difficult figure to obtain, requiring either long-term studies which assess changes over significant periods, or complex studies which measure carbon being incorporated into the soil and deduct soil respiration to calculate net sequestration. In the case of orchards studies have been undertaken using both methods, and results are comparable. Figures for annual sequestration to soils are presented in Table 6.

Table 6: Annual sequestration of carbon to orchard soils (t/ha/yr.)				
Country	Orchard Crop	Reported by	Age of orchard (years)	Annual sequestration (t C/ha/yr.)
USA	Apples	Atucha et al	9	1.1
USA	Apples	Leinfelder et al	17	3.0
USA	Apples	May et al	5-6	0.9 – 2.8
Japan	Peach	Sekikawa et al	Not stated	5.9
New Zealand	Apples	Page	Not stated	2.6
China	Peach	Guo et al	Mixed	4.9
Ireland	Apples	Greaney	23	1.8

As can be seen from the table, the figures for peach orchards are higher than apple orchards. Typically peach orchards are left in situ for longer than apple orchards. In addition, the figures for apple orchards are generally lower for younger orchards, which is probably due to the lesser leaf fall and lower levels of litter from trees being incorporated into soils when trees are young. According to Wu et al (2012), the orchards they were studying in China became net C absorbers (taking into account C inputs due to fertiliser applications etc. when growing the crop) at some point after the 5<sup>th</sup> year, which would concur with what is observed here. From the point of view of ongoing annual net sequestration, it is difficult to estimate at what point in the future annual net sequestration would begin to decline due to a saturation effect. At the moment this is an unknown for Irish orchard soils, and requires further study.

### **Carbon inputs in the growing cycle:**

Thus far the focus of discussion has been the sequestration of carbon by orchards and orchard soils. In order to complete the calculation, it is also necessary to take into account all carbon inputs in running the orchard.

For apples a very comprehensive case study was completed in New Zealand by Saunders (2006) which indicated a figure of 16.4 kg of C emissions per tonne of apples, or 0.8t/ha/yr. based on a yield of 50 t/ha. A very similar figure was arrived at by Kizilaslan (2009) for apples grown in Turkey, while Page (2011) came up with a higher figure for New Zealand-grown apples of 1.3t/ha/yr.

In Ireland comprehensive data is also available, based on the methodology of Saunders (2006), which takes into account all inputs. Such a calculation is completed in Table 7, for an orchard in Co. Tipperary, using data collected there as part of the Bord Bia Origin Green Program.

Table 7: Carbon inputs as measured for a 14.1ha apple orchard in Co. Tipperary in 2014				
Input	Total	CO2 equivalent (kg)	CO <sup>2</sup> per ha (kg)	C per ha (kg)
Direct & Indirect:				
Diesel	3568 litres	9527	676	184
Electricity	12000kWh	4632	329	90
Agrochemicals		3906	277	75
Fertiliser		2390	169	46
Capital (write-off)				
Farm Buildings			7	2
Tractors			100	27
Bins			40	11
Other equipment			100	27
Tree posts etc.			20	5
Irrigation equipment			3	1
Total			1721	468

This shows that in 2014, the carbon inputs were 468kg per ha. The reasons these figures for Ireland were lower than reported by Saunders (2006) for New Zealand is that in the interim growers have been attempting to lower the carbon footprint of production, and, for instance, have purchased more fuel-efficient tractors, have been mowing the orchard less frequently, making less passes with spraying equipment, using plant protectant chemicals which have a lower carbon footprint, and reducing fertiliser use. For instance, on this particular Tipperary farm, in 2011 the per ha diesel use was 40% higher than in 2014 and CO<sup>2</sup> associated with agrochemicals was 44% higher.

#### Overall net sequestration – completing the calculation:

Only the research paper by Page (2011) calculated an overall net sequestration due to orchards, taking into account the carbon inputs involved, and ignoring sequestration by fruits. This indicated a net sequestration for apples of 1.3 tons C per hectare per year. This is most likely an underestimate of net sequestration achieved in New Zealand orchards nowadays, as it assumed 36 spray passes and 619 litres per ha per year of fuel use, this difference alone overestimating today's C input by about 0.3t C/ha/yr.

A number of papers calculated sequestration excluding inputs, and these figures showed a net ecosystem productivity for peaches in Japan of 7.35t/ha/yr. (Sekikawa 2005), and 4.9 t/ha/yr. for the same crop in China (Guo et al. 2013). Wu et al (2012) calculated apple orchard sequestration at 14 t C/ha/yr., but this included fruit sequestration (probably about 3t/ha/yr.), and also did not take into account carbon inputs.

To come to a conclusion for net sequestration in Irish grown apples is possible by calculating as follows:

Annual carbon sequestered in tree structural wood + annual increase in SOC minus annual carbon inputs.

Plant structural wood:	1.8		
SOC increment:	<u>1.8</u>		
	3.6		
Carbon inputs:	<u>0.5</u>		
Net annual sequestration	3.1	(t C/ha/yr.)	or 11.4t CO <sub>2</sub> /ha/yr.

## Comparison with the forestry sector in Ireland:

### Forestry:

Forestry represents the gold standard in terms of carbon sequestration. About 730,000 ha of Ireland is dedicated to forestry, and the total carbon store of wood and soil is estimated at about 380 million tonnes. The 300,000 ha of forestry planted in Ireland since 1990 was credited with sequestering 17 million tonnes of carbon dioxide over the 2008-2012 period (Dept. of Agriculture, Food and the Marine, 2015). This is equivalent to 14.2 tonnes per ha per year in each year of the four year period. The figure for Irish orchards, at 11.4t/ha/yr. compares well with this. Where researchers in other countries made similar comparisons between orchards and forestry, similar results were reported (Sekikawa, 2005; Hu et al, 2014; Zantonelli et al. 2013).

## References:

- Agriculture, D. o. (2015) *A discussion document on the potential for Greenhouse Gas (GHG) mitigation within the Agriculture and Forestry Sector.*, Dublin: Government of Ireland.
- Anthony, R. (2013) *Carbon Storage in Orchards*, unpublished thesis (PhD Thesis), Bangor.
- Atucha, A., Merwin, I. A. and Brown, M. G. (2011) 'Long-term Effects of Four Groundcover Management Systems in an Apple Orchard', *Hortscience*, 46(8), 1176-1183.
- Black, K., Creamer, R. E., Xenakis, G. and Cook, S. (2014) 'Improving forest soil carbon models using spatial data and geostatistical approaches', *Geoderma*, 232, 487-499.
- Dorji, T., Odeh, I. O. A., Field, D. J. and Baillie, I. C. (2014) 'Digital soil mapping of soil organic carbon stocks under different land use and land cover types in montane ecosystems, Eastern Himalayas', *Forest Ecology and Management*, 318, 91-102.
- Greaney, J.-A. (2009) 'Changes in Soil Carbon Stocks following conversion of Grassland to an Apple Orchard', paper presented at Limerick,
- Guo, X.-y., Cai, T., Duan, X.-w., Han, Y.-j., Huang, D. and Da, L.-j. (2013) 'Carbon storage and distribution pattern in main economic fruit forest ecosystems in Shanghai, East China', *Shengtaixue Zazhi*, 32(11), 2881-2885.
- Hu, Y.-t., Guan, D.-s., Wang, H. and Sun, L. (2014) 'Carbon storage of evergreen broad-leaved forest and orchard ecosystems in Guangzhou', *Shengtaixue Zazhi*, 33(11), 2873-2879.
- Kerckhoffs, L. H. J. R., J.B. (2007) *Carbon sequestration in the standing biomass of orchard crops in New Zealand.*, Hastings, New Zealand: New Zealand Institute for Crop and Food Research.
- Kimetu, J. M., Lehmann, J., Kinyangi, J. M., Cheng, C. H., Thies, J., Mugendi, D. N. and Pell, A. (2009) 'Soil organic C stabilization and thresholds in C saturation', *Soil Biology & Biochemistry*, 41(10), 2100-2104.
- Kizilaslan, N. (2009) 'Energy use and input-output energy analysis for apple production in Turkey', *Journal of Food Agriculture & Environment*, 7(2), 419-423.
- Lakso, A. N. (2010) 'Estimating the Environmental Footprint of New York Apple Orchards', *New York State Fruit Quarterly*, Spring.
- Lakso, A. N., Wunsche, J. N., Palmer, J. W. and Grappadelli, L. C. (1999) 'Measurement and modeling of carbon balance of the apple tree', *Hortscience*, 34(6), 1040-1047.
- Lee, T.-K., Choi, J.-J., Kim, J.-S., Lee, H.-C. and Ro, H.-M. (2013) 'Carbon and Nitrogen Stocks of Trees and Soils in a 'Niitaka' Pear Orchard', *Korean Journal of Horticultural Science & Technology*, 31(6), 828-832.

- Leinfelder, M. M., Merwin, I. A. and Brown, M. G. (2012) 'Soil Health Indicators, Apple Tree Growth, and Carbon Sequestration Differ among Orchard Groundcover Management Systems', *Xxviii International Horticultural Congress on Science and Horticulture for People (Ihc2010): International Symposium on Environmental, Edaphic, and Genetic Factors Affecting Plants, Seeds and Turfgrass*, 938, 333-339.
- Leon, A., Kohyama, K., Takata, Y., Yagi, K., Umemiya, Y., Ohkura, T. and Obara, H. (2015) 'Change in soil carbon in response to organic amendments in orchards and tea gardens in Japan', *Geoderma*, 237, 168-175.
- Mays, N., Brye, K. R., Rom, C. R., Savin, M. and Garcia, M. E. (2014) 'Groundcover Management and Nutrient Source Effects on Soil Carbon and Nitrogen Sequestration in an Organically Managed Apple Orchard in the Ozark Highlands', *Hortscience*, 49(5), 637-644.
- Moriarty, P. (2014) 'Soil Organic Carbon Stocks in an Orchard', paper presented at Limerick,
- Page, G. (2011) 'Modeling Carbon Footprints of Organic Orchard Production Systems to Address Carbon Trading: An Approach Based on Life Cycle Assessment', *Hortscience*, 46(2), 324-327.
- Saunders, C. B., Andrew; Taylor, Greg. (2006) *Food Miles - Comparative Energy/Emissions Performance of New Zealand's Agriculture Industry*, Christchurch, New Zealand: Lincoln University.
- Sekikawa, S. (2005) 'Evaluation of carbon sequestration in two fruit orchard ecosystems', *Bulletin of the Faculty of Agriculture Tamagawa University*, (45), 23-44.
- Song, X., Peng, C., Zhou, G., Jiang, H. and Wang, W. (2014) 'Chinese Grain for Green Program led to highly increased soil organic carbon levels: A meta-analysis', *Scientific Reports*, 4.
- Spink, J. H., Richard, Forristal, Dermot and Creamer, Rachel *Soil Organic Carbon: A review of 'critical' levels and practices to increase levels of tillage in Ireland.*, Oak Park Crops Research Centre, Carlow.: Teagasc.
- Stewart, C. E., Paustian, K., Conant, R. T., Plante, A. F. and Six, J. (2008) 'Soil carbon saturation: Evaluation and corroboration by long-term incubations', *Soil Biology & Biochemistry*, 40(7), 1741-1750.
- TerAvest, D., Smith, J. L., Carpenter-Boggs, L., Granatstein, D., Hoagland, L. and Reganold, J. P. (2011) 'Soil Carbon Pools, Nitrogen Supply, and Tree Performance under Several Groundcovers and Compost Rates in a Newly Planted Apple Orchard', *Hortscience*, 46(12), 1687-1694.
- Wu, T., Wang, Y., Yu, C., Chiarawipa, R., Zhang, X., Han, Z. and Wu, L. (2012) 'Carbon Sequestration by Fruit Trees - Chinese Apple Orchards as an Example', *PLoS ONE*, 7(6).
- Yagasaki, Y. and Shirato, Y. (2014) 'Assessment on the rates and potentials of soil organic carbon sequestration in agricultural lands in Japan using a process-based model and spatially explicit land-use change inventories - Part 2: Future potentials', *Biogeosciences*, 11(16), 4443-4457.

Zanotelli, D., Montagnani, L., Manca, G. and Tagliavini, M. (2013) 'Net primary productivity, allocation pattern and carbon use efficiency in an apple orchard assessed by integrating eddy covariance, biometric and continuous soil chamber measurements', *Biogeosciences*, 10(5), 3089-3108.

Table 1. Indicators (IC) values for 10-year-old apple orchard (mean ± SD).

Indicator	10-year-old orchard		10-year-old orchard		10-year-old orchard		10-year-old orchard	
	Mean	SD	Mean	SD	Mean	SD	Mean	SD
IC1	1.05	0.18	1.05	0.18	1.05	0.18	1.05	0.18
IC2	1.05	0.18	1.05	0.18	1.05	0.18	1.05	0.18
IC3	1.05	0.18	1.05	0.18	1.05	0.18	1.05	0.18
IC4	1.05	0.18	1.05	0.18	1.05	0.18	1.05	0.18
IC5	1.05	0.18	1.05	0.18	1.05	0.18	1.05	0.18
IC6	1.05	0.18	1.05	0.18	1.05	0.18	1.05	0.18
IC7	1.05	0.18	1.05	0.18	1.05	0.18	1.05	0.18
IC8	1.05	0.18	1.05	0.18	1.05	0.18	1.05	0.18
IC9	1.05	0.18	1.05	0.18	1.05	0.18	1.05	0.18
IC10	1.05	0.18	1.05	0.18	1.05	0.18	1.05	0.18

(Anthony 2013, Dorji et al. 2014, Greaney 2009, Guo et al. 2013, Hu et al. 2014, Kerckhoffs 2007, Lakso et al. 1999, Lee et al. 2013, Leinfelder et al. 2012, Leon et al. 2015, Mays et al. 2014, Moriarty 2014, Page 2011, Sekikawa 2005, Song et al. 2014, Spink, Stewart et al. 2008, TerAvest et al. 2011, Wu et al. 2012, Yagasaki and Shirato 2014, Zanotelli et al. 2013, Atucha et al. 2011, Lakso 2010, Agriculture 2015)

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I back the WASG recommendations that the Department should take on board when developing CAP plans.

- That women with at least a Level 6 in Agriculture or who have been head of a farm holding for at least three years qualify for the TAMS 60% grant.
- The 60% TAMS age limit must be raised to the incoming pension age of 67 - this is vital in the context of ensuring that older women who are active on family farms are given the support to become equal partners before reaching pension age and avoid repeating mistakes of the past.
- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

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