

## Submission Form for CAP Post 2020 Consultation

Name: Base Ireland    Farmer or Non Farmer: Farmer

Contact email or phone number [REDACTED]

The questions below are to provoke thinking. There may of course be other questions you consider more relevant and we would welcome your input on those as well.

### 1. Simplification:

*How can the CAP be simplified for beneficiaries and administrators, while maintaining an appropriate balance in terms of public accountability and value for money for EU taxpayer's funds?*

Ensure that only the percentage of the SFP is held that is the possible fine instead of the whole payment placed on hold.

### 2. Direct Payments

*Having regard to both the Food wise 2025 and the CAP ambition to support economic development and employment creation, particularly in rural areas, what are your views on potential proposals to target direct payments differently?*

- 1) Continuation of the protein payment scheme for tillage farmers
- 2) Expansion of protein scheme to include combi crops that are brought to harvest with combine harvester such as barley/pea mix etc
- 3) Supports for covering some of the cost of variable soil sampling to generate variable rate soil maps which when linked to the wider adoption of gps controlled fertiliser spreaders will in time reduce the application of nutrients.
- 4) Payments to tillage farmers practicing reduced tillage/direct drilling to reduce soil losses such as direct erosion and soil carbon levels.

### **3. The Environment**

*What do you believe should be the environmental priorities under the next CAP?*

*Bearing these priorities in mind and considering Ireland's ambition for the sustainable development of the food sector, how should pillar I (direct payments) and pillar II (rural development) combine with private sector funding post 2020, to help the sector contribute to National climate change obligations and increase its contribution to water quality and biodiversity?*

- 1) The continuation of the GLAS scheme is essential to the wider adoption of environmental measures such as reduced tillage, field margins, cover cropping and hedgerow management
- 2) Promotion of conservation agriculture
- 3) Overwinter cover crops should be mandatory on all land destined for spring cropping to reduce soil erosion, nutrient loss, with focus on the water quality benefits in catchments.
- 4) Removal of the three crop rule which in Ireland only encouraged the production of oats which have a lower market value than other cereals but rather a move to a system based on rotation with higher percentage of cropping diversity receiving higher payments under a greening scheme.
- 5) Establish a benchmark of soil carbon levels and allow a simple online system that farmers can update each land parcel
- 6) The greening payment should be focussed on soil carbon sequestration and soil health.
- 7) Wildflowers in field margins and meadows need to be encouraged to help with pollinator protection.
- 8) A scheme which encourages appropriate hedgerow management with any gaps planted with native hedging.

### **4. Risk Management**

*What sort of risk management measures for primary producers should be considered under the next CAP and how should they complement current EU measures such as intervention, Aids to Private Storage and Exceptional Measures ?*

## **5. Young Farmer Supports**

*How should the CAP encourage young people into farming, the exit of the older generation and facilitate succession planning*

A financial support needs to be put in place to support older farmers to encourage measures such as long-term leasing of land to young farmers. Without this there is no point in trying as the older generation often have no pension apart from their farm.

## **6. Research, Innovation, Technology Transfer**

*How can the CAP be used to build a smarter agriculture, and to translate research outcomes into real technology adoption that contributes to improved margins, greater resilience and better environmental impact on farm?*

*What role should vehicles like advisory services and producer organisations play?*

Targeted niche funding for local led projects such as the current European Innovation partnerships (EIP). This should be aimed at local schemes which can show the benefits of conservation agriculture on the environment, farm financial viability and reduced greenhouse gas emissions.

Increased funding for increasing the wider adaption of conservation agriculture and showing the benefits to the broader farming and non-farming communities.

The current knowledge transfer scheme has failed in transferring new technologies in the tillage sector as there is limited new information.

Funding for projects like the Smart grass project which investigated the benefits of mixed herbal leys in livestock production should be continued.

## **7. On Farm Investment**

*What should the on farm investment priorities be in the next CAP and how can financial instruments (or loans) play a role?*

- 1) Tams to be continued with focus on
  - a) Slurry and manure storage on tillage farms to enable transfer of organic manures and reduce reliance on bagged fertilisers
  - b) Continued funding of precision agriculture technologies such as sprayers and fertiliser spreaders
- 2) Allow livestock farmers to become eligible for direct drills to enable the regeneration of grasslands.
- 3) Ditch maintenance along field boundaries to clean up years of underinvestment due to low margins which is directly impacting farmers with climate change and increased rainfall variability and subsequent impact on farmland with soils at field capacity.

## **8. Strengthening the socio-economic fabric of rural areas**

*How can the CAP complement other European Structural and Investment Funds and the Government's Action Plan for Rural Development to support the social and economic development of rural communities, including through the development of new value chains such as clean energy, the emerging bio-economy, the circular economy or rural tourism?*

Locally led energy generation such as anaerobic digestion should be encouraged to produce renewable gas, electricity and where possible heating. The current feed in tariffs are poor and currently is uneconomically viable.

With current margins in livestock poor, the encouragement of local co-op farmer owned AD plants to allow grass and other sustainably grown materials to be used in local AD plants and allow an alternative income source.

**9. Health, Nutrition, Food Waste and Animal Welfare**

*Can the focus of the CAP in these areas be sharpened, and can it complement other measures in emerging areas of concern such as food waste or anti-microbial resistance and if so how?*

Food wastes where possible should be diverted to composts which can be applied to farmland as fertilisers and soil conditioners.

Funding for herd health clubs with vets with a focus on herd/flock health and the aim of reducing antibiotics, funding for faecal testing to focus appropriate measures to control worms etc along with post mortum on falling stock.

Rubber mats for slatted sheds to be compulsory and partially funded under tams.

The inclusion of native irish grown cereals and proteins needs to be encouraged. The current system is based on GM maize and soya and yet when the produce is marketed abroad its not mentioned in Irelands green image.

**10. Position of the Farmers in the Supply Chain**

*Can the CAP post 2020 do more to complement other measures to strengthen the position of farmers in the supply chain and if so how?*

## 11. Any Other Information

Thank you for taking the time to make a submission. It should be sent by email to [cap\\_post2020@agriculture.gov.ie](mailto:cap_post2020@agriculture.gov.ie) or by post to EU Division, Department of Agriculture, Food and the Marine, Floor 6 Centre, Agriculture House, Kildare Street, Dublin 2, marked "Submission on CAP post 2020". **The deadline for receipt of submissions is 23<sup>rd</sup> March 2018.**

**Please note your submission may be subject to a Freedom of Information request.**