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Sent: [REDACTED]
To: CAP Strategic Plan
Subject: Suggestions

To whom it may concern.

I have the following suggestions for cap reform. I am a grain cattle and sheep farmer from north cork.

I think that % bps fines for a breach is a bit unfair. If a two farmers commit the exact same offence one will invariably end up paying a lot more than the other if they have a big difference in bps. Punishment should fit the crime consistently in my opinion.

Bps should never be completely withheld over a tiny issue. Often a small amount of land is being "investigated". It feels like blackmail stopping our income, even if we have a strong case it's always easiest to give in and get the desperately needed payment. Withhold the amount of money corresponding to the amount of ground involved. Not all of it. Stopping people's wages is not tolerated in any other sector.

Tams could expand to fire safety. Extinguisher in every machine should be standard.

Straw rake is surely a step towards ipm on slugs so should be in under tams too along with other minimal tillage equipment.

Investment in facilities to be able to store any organic manures on tillage farms would be a huge step towards helping the nitrates problems on animal farms. Grain farmers need the nutrients, stock farmers need an outlet.

I have heard that bps will be capped on the claimant instead of the owner of the entitlements. If this is true it helps the non farming farmer and penalises the working farmer. A man with a hefty payment from historic farming can lease it out to a few people and bit be capped, while not farming at all. Where as a man trying to farm more acres and employ people and produce food will be the claimant that is capped as he will have to rent entitlements from a few people if he is to keep his acres viable. It doesn't make sense to me.

As a general comment on capping, I know it's politically popular but there is nothing to show that a small farm is more environmentally friendly than a large one, often larger farms are under more scrutiny and hence often better. Also employment should be considered, larger farms provide incomes for their staff which is never noted on any department information. If there is a next generation coming who are interested in farming, making the farm smaller and penalising large farmers makes it an awful lot harder to keep the succession going if the farm is to be split up in the future.

The protein payment for crops such as peas and beans is essential if we are to have any independence from the huge amount of GM protein that comes from abroad. It is a dangerous secret that almost all out beef and milk with our wonderful image has GM protein in its diet. More protein crops should be included.

Rewarding us for our incredible biodiversity in our hedgerows is a massive opportunity missed by Ireland. All visitors from abroad comment on how much we have. Even new Zealand visitors, we

have far more here than they do. France and Germany would love to have what we have here on terms of natural hedges and scrub for their own countries.

Break crops are essential for good tillage farming. More help to open up markets for crops like linseed would be a great help. We can grow them, an industry that needs them is part of what is missing.

Lastly, with the environment becoming more front and center in all government policy looking at the possibility of carbon credits is a huge opportunity in agriculture. As grain farmers increasing soil organic matter is a fantastic way of sequestering carbon into our soils that desperately need it. There are great methods being developed to do this and any of these should be greatly encouraged and rewarded in the new cap reform. Min til, direct drilling, zero til, cover crops, using compost and organic manures to get away from the huge carbon footprint and run off issue with inorganic fertiliser are all fantastic ways of moving the industry to a more sustainable future.

Thank you for your time

Best regards

Rob Coleman

