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Subject: Open Call for Submissions: CAP Strategic Plan- Swot Analysis

To Whom it may concern,

Following up on the Departments of Agriculture's call for CAP reform submissions at last weeks National Crops Forum I am submitting the following proposals:

**1: Continue the GLAS scheme which encourages farmers to incorporate cover crops into their rotation.** This is hugely beneficial to both the farmer (economically and agronomically) and the surrounding environment (biodiversity, carbon sequestration and water quality). I would suggest a review of the sowing rates of species in cover crops (especially where more than 2 species are used), increasing the number of species that can be used in cover crops e.g. maize and linseed are both very beneficial to soil structure but are not included on the list of approved cover crop species. By lowering the maximum seeding rates, but increasing the number of species in a mix the environmental and agronomic benefits of a cover crop will increase e.g. a wider range of plants in the covercrop (and thus through the rotation and wider farmed landscape) will in turn provide food and shelter for a greater range of wildlife, both vertebrates and invertebrates. **Lower the seeding rate of a single species in a cover crop and increase the number of species in the cover crop mix.**

**2: Continue the Tams grant for the purchase of no-till and strip till equipment.** Farmers recognize the the environmental and economical benefits of reduced tillage practices, yet are often afraid to switch due to perceived risks and the need to buy specialist drilling equipment. The 40 and 60 percent TAMs grants have removed some of the risk and made the switch more affordable for farmers.

**3: The three crop rule:** This is in dire need of review. The three crop rule has played a role in the decrease of the small tillage producer in Ireland. Take the example of a farmer with 30 ha of land, he or she is required to grow 3 crops, requiring (if they do not own their own machinery, which many don't) three different visits for planting and harvesting and multiple visits by contractors for crop nutrition and pest management practices. To avoid this many of these small growers have rented land to expanding dairy enterprises which often grow a monoculture of ryegrass. In largely dairying regions of the country, this has removed the patch work nature of the landscape which provided a host of habitats for different species. **By allowing small growers to grow one crop in the year, but enforcing a rotation over a four year period e.g. beans, wheat, barley, oats and repeated, would allow for crop management to be streamlined, while allowing for a return of diversity in the landscape at a micro and macro level.**

The question begs to be asked why a tillage farm of 30 ha must grow three crops, while a dairy farm of 60, 90 or 120 ha can grow a monoculture of a single grass species across its entire area. This is also in need for a review. **Multi species swards and diversity of cropping on livestock farms must be closely examined.**

Rotations are vital to farming and the "three crop rule" has forced larger producers to adopt rotations and rediscover the benefits of them, (weed, pest and disease control along with nutrient management). However rotations are based on grass species cereal crops. In theory a grower could have a rotation within the three crop rule of winter wheat, winter barley and winter oats, this provide little environmental benefit as all three crops share a similar drilling and harvest date and

play host to similar species. The issue is not within the farm gate here however, it is with markets available for alternative crops and the economics of growing alternatives. see point 4.

**4: The subsidy on legume crops.** This has been a very successful scheme and has really showed farmers and agronomists the true benefits of rotation. It has brought with it a host of environmental, agronomic and economic benefits. At a minimum this needs to be maintained. I would suggest the scheme should be opened to include crops like Lupins and high protein forage crops such as Lucerne or red clover. By subsidizing broadleaf legume crops, it generates critical mass of produce of a particular crop in the market, thus allowing feed merchants to be able to gear their operations towards handling native produced legumes e.g. beans, peas or lupins, in animal ration. Without the influence of the subsidy these crops would remain uneconomical and thus never generate the mass required to gain the attention of animal feed manufacturers.

**By combining all the points: covercrops, minimum disturbance drilling and rotations we can create Conservation Agriculture.** This has huge implications both on and off farm by increasing biodiversity, improving soil and water quality, reducing the need for pesticides, reducing the demand for fossil fuels, both as diesel fuel and as fertilizer. The cost savings brought about by adopting Conservation Agriculture will go on to make farms more economically viable, more environmentally sustainable and improve the offering of public goods and services produced on the farms of Ireland (clean air and water and increased biodiversity).

**5: Chopping of cereal straw.** Farmers are aware of the benefits of chopping straw both to their nutrient management and the role this plays in carbon sequestration and the knock on benefits this has for wider society. However short term cash flow requirements mean that farmers bale and export straw rather than returning it to their soil. I would propose a scheme where farmers are paid a grant to chop a percentage of their cereal straw. The money required for this will be raised on carbon taxes with heavy green house gas emitters e.g. the air line industry. Chopping of crop residue is not fundamental to Conservation Agriculture but is hugely beneficial to it.

Kind regards,

Sam Deane.