

Submission Form for CAP Post 2020 Consultation

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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?

Put the onus on the farmer to come up with the results the CAP reform wants to achieve – make the CAP a Results-based payment scheme.

Farmers will carry out a self-assessment on the environmental, animal welfare, and other cross-compliant issues/aspects of their own farm and will be paid on the score that they attain. Independent spot-checks can then be carried out to verify the scores and adjust payments accordingly.

No penalties as such but lower or higher scores for low or high standards.

This is the way forward.

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?

Foodwise 2025 targets are the death of both the farmer and the environment. The targets did not take into account the demands that increased scale and lower labour availability are having on individual farmers.

The race to the bottom to produce cheap food has resulted in Irish farmers not being able to adhere to the higher environmental standards that the modern and up and coming consumer are looking for.

Direct payments will have to incentivise farmers to manage and protect farm habitats such as hedgerows, wetland, field margins, woodland etc. etc. that are providing the ecosystem services that are now seen as vital to a healthy farming landscape.

There is a need to help smaller farmers who cannot compete with the scale of larger-scale farming (higher output and lower costs due to operation scale) especially when it comes to purchase and leasing of land.

We are going down the road of depopulating our rural countryside with less and less farmers every year. This is also counter-productive to our image as green, high food quality, small family farm orientated country. There is a need to change to a high value, premium, green food product rather than a cheap, mass-produced, commodity-based one we are now producing.

Farmers are continually having to expand to remain viable because of the current model where food price is remaining relatively static and farmers are having to increase numbers and hectares, increase slurry, fertiliser and spray usage leading to environmental damage.

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?

Biodiversity improvement should be a priority as it will automatically improve both water quality and a farms carbon footprint at the same time.

Change to a Results-based payment system where farmers are incentivised to improve biodiversity and water quality and lower their carbon footprint.

The BRIDE Project could be a template for this. All land on the farm has a value whether it is the cropping area of cereals or grass, wetland for water quality, flood prevention, biodiversity, woodland for carbon storage and biodiversity, hedgerows for biodiversity, visual landscape appearance (tourism) and carbon lowering etc. etc.

Entry to environmental schemes needs to change to a selection process rather than an entry form process whereby farmers must choose options and get a minimum score to enter a scheme. This means a farmer is taking part for all the right reasons.

Higher payments should be given to farmers who are not in derogation. This would encourage farmers to use less fertiliser, meaning lower stock numbers (lower carbon footprint), lower nitrous oxide emissions, higher biodiversity levels and improved water quality.

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 ?

Climate and more specifically climate events such as very dry, very wet, cold/hot events can be devastating for food production and farming – even more so than price at times. Spikes in food production can lead to price crashes until the product becomes scarce again.

Support needs to be available to allow for the volatility of world market prices so that farmers are not shouldering the burden of price volatility.

5. Young Farmer Supports

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

The previous Early Retirement Scheme gave a retiring farmer a pension to fall back on when the farm was transferred over. This needs to be recommenced to allow young farmers access to running the farm at a young age while also providing financial support to the retiring farmer. Family farms are now very often 2 income farms where one of the partners are working off-farm – expecting the farm to generate a second income for the retiring farmer will put a strain on the farm income going forward as well as a possible strain in the family relationship.

When choosing a career path after second level, farming has to appeal to young people. It has to be able to compete on income, quality of life, workload and hours worked, time off and holidays, job satisfaction and rewards, etc. etc. Perception and image needs to change so that the better aspects of farming are seen by the next generation of farmers – this is not happening at the moment. Having a showcase farm (changing every year) attached to every national school in Ireland will have huge long-term benefits for the food industry and the country as a whole. This could be part funded by the CAP and industry itself.

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?

The present advisory service whether public or private have been advising farmers based on producing food as cheaply as possible leading to farmers struggling to cope with higher environmental criteria. There needs to be ecological advice available to farmers to demonstrate environmental best practice while also maintaining a viable farm income. Producing food sustainably is a new ball game.

More money needs to go in to environmental research to allow farmers maintain food production while at the same time, improve biodiversity and water quality and lower their carbon footprint.

There needs to be a sharper focus on soil and more money needs to be put into soil biology and how improving it can deliver on lower fertiliser rates and higher food quality (nutrient density). As farmers we take soil for granted and damage it. It is not producing to its capabilities.

Advising farmers to plant trees in every corner of the farm will lead to continuing declines in biodiversity.

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?

- New technologies to reduce workload and improve work/life balance so that the next generation will embrace farming
- Incentives for farmers to fund green technologies such as renewable on farm energy generation.
- Incentives to support farm consolidation e.g. if a farm comes up for sale or lease an adjoining farm should get first priority to purchase or lease. This could be increased if the farm comes under a certain size threshold. This means smaller farms could be supported to increase their own holding and be in a position to improve their viability under the current system. Consolidating farm holdings will mean huge efficiency increases.

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?

Increasing funding to rural development projects through leader etc. will lead to rural regeneration and the rural landscape remaining viable. With tourists now looking for the “off the beaten track” destinations rural Ireland can offer these experiences with joint community/farming initiatives such as rural walks and “local food” tearooms.

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?

Getting away from a mass-produced food product that may not have the nutrient density or health values it could have should be a focus of the new CAP. This will in time lead to a healthier population and healthier environment.

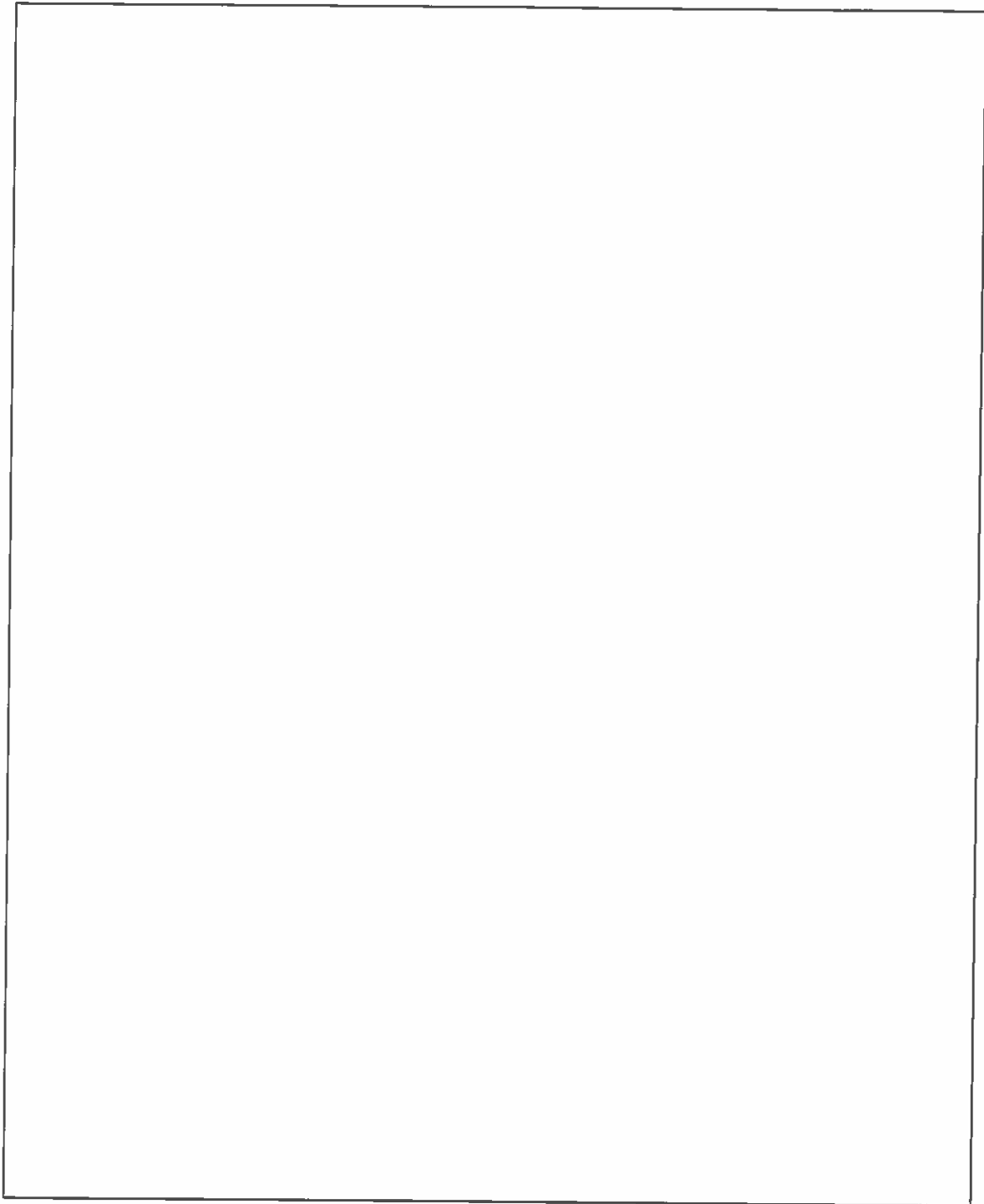
WE ARE WHAT WE EAT!

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?

Farmers are at the bottom of the food production chain – they are price takers and there needs to be more transparency between consumer, retailer , processor and farmer to ensure farmers are paid a fair price and to ensure environmental criteria are not compromised because of very low farm incomes. Processors and retailers cannot promise to supply sustainable food if their farmers cannot guarantee it. At the moment the Origin Green accreditation does not give credit to high biodiversity or high water quality standards. There is a need for a separate environmental accreditation.

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 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 23rd March 2018.

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