

From: tom tierney <[REDACTED]>
Sent: [REDACTED]
To: [REDACTED]
Subject: Submission for CAP 2020.

A Chara,

Could I suggest that the protein scheme is continued?
The reason being it has created a home grown protein market (ie beans) & reduces our national burden on imported products.

Further, could I suggest that triticale may be added to the protein list ?
It is a hybrid rye high in protein & a very useful addition in pig & chicken ration.
From a tillage farmer point off view, it would be another crop to add to diverse crop rotations, which are good for soils & environment.
In addition perhaps it could create a new Irish market just as beans has done, heretofore.

Regards,
Tom Tierney.

A Chara,

Could I propose a possible change to the CAP admin practice post 2020 from the current CAP model. Which if implemented would elevate cashflow issues for farmers where under cross compliance review & allow Dept officials a wider window off opportunity to address those same non cross compliance issues.

Essentially, my suggestion is that where a farmer is under cross compliance checks, in his year off application, he would still receive his full, on-time payment in October/ December of that year while still under investigation.
Any fines to be imposed from the results of non cross compliance investigations would be taken into account & deducted from the following years payment.

This would mean the farmer would have 12 months to budget & adjust cashflow expenses to take into account his impending reduced EU payment.
By extension it also means the department wouldn't have to deal with non cross compliance issues in such a short timeframe as is currently in place (ie that calendar year or year end off).

Most Irish farms in today's economic climate total 100% rely on the EU payment, to function viability.
As reported by Teagasc advisory many times.

This suggestion, I believe would allow farms (especially tillage sector farms for example) who have annually crop sales & annual cashflow lending requirements to instal for the preceding 12 months, operate more financially efficiently, than under the current CAP system as it is administered.

I hope this suggestion makes sense as you read it through. If perhaps not please feel free to reply or call [REDACTED] to broadly discuss further.

Most sincerely,
Tom Tierney

A Chara,

A suggestion has been made in the media that €80 would be deducted from higher value entitlements.

Before this should happen the whole area of eligible farmer status needs to be revisited.

Armchair farmers or landlord farmers (not actively farming) should not qualify for entitlement payments on the back of someone else who actively farms their land.

Those entitlements should not be transferable.

I'd also think meat factory owners or huge stud farm enterprises who actively seek to "farm" entitlement payments from the EU cap schemes should be barred from doing so. In so far as that is not what the CAP is about in the first place.

Regards,
Tom Tierney