

# **IFA Submission**

to the Political Parties and  
Dáil Candidates for the

# **2016 General Election**

January 2016

# Table of Contents

	Page
Message from IFA	3
<b>1. Farm Incomes, National Funding of Farm Schemes and Charter of Rights for Farmers</b>	<b>4</b>
• Farm Incomes	4
• Farm Schemes	4
• Charter of Rights for Farmers	4
<b>2. CAP, EU and International Policy</b>	<b>5</b>
• CAP – European Common Agricultural Policy	5
• International Trade Policy	5
• Market Access	5
• Climate Change	6
<b>3. Sustainable Farm Incomes – Key to Maximising Growth in the Agri-Food Sector</b>	<b>7</b>
• Retailer regulation and viable output prices	7
• Input prices	7
• Taxation Priorities	8
• Farm Finance	8
<b>4. Sectoral and Rural Development measures to improve Competitiveness</b>	<b>9</b>
• Livestock sector	9
• Cattle	9
• Sheep	9
• Dairy	10
• Pigs and Poultry	10
• Animal Health	10
• Grain	11
• Potatoes and Horticulture	11
• Forestry	11
• Aquaculture	12
• Equine	12
• Rural Development Programme 2014 – 2020	12
• GLAS	12
• Targeted output Agri-Environmental scheme	12
• Areas of Natural Constraint (formerly Disadvantaged Areas)	13
• TAMS II	13
• Knowledge Transfer and Education	13
• Designated land	14
• Rural Walks Scheme	14
• Leader	14
• Environment	14
• Renewable Energy	14
<b>5. Rural Services and Infrastructure</b>	<b>16</b>
<b>6. Other Policy Issues</b>	<b>18</b>

# Message from IFA

In the 2016 General Election, farmers and their families wish to engage with the political parties and election candidates on a range of important issues affecting their incomes and the well-being of rural Ireland.

Throughout the period of economic recession, farming and the agri-food sector was a major driving force towards national economic recovery, delivering increased export earnings and sectoral employment growth throughout Ireland. In 2014, the agri-food sector contributed €10.5 billion worth of exports, employing 300,000 people directly and indirectly making it Ireland's largest indigenous productive sector.

However, despite our ongoing positive contribution to economic recovery, profitability at farm level remains a major challenge for many farming enterprises<sup>1</sup>. The combination of reduced national funding for farm schemes during the downturn, together with lower CAP support and greater exposure to volatile world markets, is threatening the viability of family farms.

**Improving farm profitability requires measures which put the sustainable and profitable growth of farming at the core of public policy for our agri-food sector.**

It is essential that politicians seeking election commit to the policy actions necessary to underpin the long-term income sustainability of farming.

This involves the full restoration of national funding for farm schemes, stronger EU CAP supports, robust defence of Ireland's interests in trade policy and climate change negotiations, action on input costs including the cost of finance, and effective measures to redress the imbalance of power in the food supply chain.

Our submission sets out the main policy issues to be addressed in each commodity sector and deals with important cross-sectoral issues. We also highlight the wider issues affecting farm families and rural communities in regard to rural services and infrastructure, social policy and farm safety.

Apart from policy issues, political parties need to demonstrate that they recognise the unique importance of the Agri-Food sector by committing to appoint a dedicated Minister to the Agriculture, Food and Marine portfolio.

During the General Election campaign, our County Executives will be meeting the candidates at constituency level to discuss this agenda. At national level, IFA will be engaging with the party leaders and agriculture spokesmen. Over 250,000 farm family voters will be keenly interested in the responses from the political parties and from candidates at national and constituency level.

---

<sup>1</sup> Teagasc National Farm Survey Income figures

# 1. Farm Incomes, National Funding of Farm Schemes and Charter of Rights for Farmers

## Farm Incomes

Teagasc's National Farm Survey figures show that farm incomes are low particularly in the vulnerable drystock sector and have been falling over time. Driven by a significant fall in dairy incomes provisional NFS figures estimate that average Family Farm Income will have dropped by 9% to €24,000. This represents less than 60% of the average Industrial wage.

Rising input costs, the reduction in CAP payments, successive budget cuts to agriculture and greater exposure to volatile world commodity markets are threatening the viability of family farms.

- This IFA Submission to the Political Parties and Dáil Candidates for the 2016 General Election sets out the policy priorities which are necessary for the development of Irish agriculture and which have at their core the need to deliver a fair return to family farms to ensure the future sustainability and growth of the agricultural industry and a vibrant rural economy.

## Farm Schemes

The measurable contribution of agriculture and the agri-food sector to economic recovery and the improvement in the public finances provide a strong justification for full national funding for the implementation of all new farm schemes. This funding under the Rural Development Programme (RDP) is critically important for the low income farming sectors, underpins farm investment and output and in turn contributes to balanced economic growth.

### IFA requires:

- Sufficient funding for farm schemes to deliver annual expenditure of €580m (national and EU) under the RDP. This includes funding for the following schemes:
  - Green Low Carbon Agri-environmental Scheme (GLAS);
  - Areas of Natural Constraint (ANCs);
  - Targeted Agricultural Measures (TAMs);
  - Beef Data and Genomics Programme (BDGP);
  - Knowledge Transfer; and
  - Targeted agri-environment and organics.
- Further national resources and unused CAP funds must be directed to support vulnerable sectors and regions, in particular through the introduction of targeted payments for Sheep, restoration of ANC payments and increased payments for the Suckler herd.

## Charter of Rights for Farmers

Farm families are heavily dependent on direct payments under the Basic Payment Scheme, Greening and the Rural Development Programme.

The new Charter of Rights for Farmers, negotiated by IFA, contains clear objectives to underpin the rights of farmers and ensure fairness and respect for farm families. The Charter includes important improvements and commitments on payment deadlines, inspection protocols and appeals.

### IFA requires:

- The Government to ensure the new Charter is fully implemented and that all commitments are delivered so that farmers can maximise the benefits from Direct Payments and farm schemes.

## 2. CAP, EU and International Policy

### CAP – European Common Agricultural Policy

Ireland currently receives €1.7bn annually under the current CAP programme 2014 - 2020. This has wide benefits to the Irish economy and underpins agricultural production.

#### IFA is seeking:

- A robust defence of the CAP Budget and the strengthening of EU supports in any future CAP negotiations;
- CAP funds to be directed towards active productive farmers under both Pillar 1 (Direct Payments) and Pillar 2 (RDP) measures into the future;
- CAP simplification, including flexible and practical operation of Greening, to eliminate the excessive compliance burden and unnecessary cost on farmers, maximise the value of supports and to improve the payment system. Simplification must include a preclearance system on the Area Aid application, a Yellow Card system for eligible land, greater tolerances, and reduced inspections for farmers;
- The effective operation of EU funded market support measures at realistic “safety net” levels to mitigate the worst impacts of extreme price volatility;
- That young farmers who have low entitlements are catered for in a National Reserve going forward.

### International Trade Policy

Continued Government action is required to guard against any trade deals that would undermine the competitiveness of Irish food exports in the EU market. Accordingly, Ireland’s critical interests in agriculture cannot be sacrificed or used as a bargaining chip in the drive to finalise trade agreements such as Transatlantic Trade and Investment Partnership (TTIP) and the recently announced New Zealand negotiations. In any negotiations, the Irish government must insist that

the EU targets trade-distorting, domestic supports and other barriers in countries such as China and the US, in order to increase market access for Irish product internationally.

#### IFA requires:

- As a fundamental principle, the EU must insist on strict equivalence of standards in trade negotiations. This means all imports must meet the same animal health, welfare, traceability, hygiene and environmental standards as are required of EU producers. These include EU constraints on the use of GMOs, hormones, growth promoters (ractopamine, BST), pesticide use and food safety measures;
- The EU must not conclude any trade agreement which runs directly counter to EU climate change objectives by facilitating the replacement of carbon efficient Irish produce on the EU market with carbon intensive imports;
- The EU must insist that Beef is designated as a sensitive product as any significant increase in imports would have a very negative impact on Irish beef prices in the EU market. Similarly the Pigmeat, Poultry and Sheep sectors must be safeguarded against any imports which target only high value cuts;
- The opening of the US market offers increased opportunities for Irish Dairy exports in the post quota era, provided regulatory barriers are removed.

### Market Access

Continued Government and state agency action is required to identify new opportunities and secure full market access in high value growing markets globally.

#### IFA is seeking:

- New opportunities and new market access for Irish exports to be developed to deliver real increases in both the volume and value of exports;

- The removal of technical barriers to allow access to the US market for manufacturing beef and to the Chinese market;
- The live export trade is crucial for price competition. Opportunities in international markets such as Egypt, Libya, Turkey and the Lebanon must be pursued. Barriers to live exports including to Northern Ireland and Britain must be removed;
- Delivery of an increased price premium for Irish food through development of an Irish brand for exported agri-food products.

## Climate Change

Feeding the world while addressing climate change is one of the biggest challenges of the 21st century. The world's population, which reached 7 billion in 2011, is expected to exceed 9 billion by 2050. Agricultural production will need to increase by an estimated 70 per cent according to the UN Food and Agriculture Organisation, with strong demand projected for commodities such as milk and meat.

Ireland is a global leader in sustainable food production, a position confirmed by Teagasc, Bord

Bia and Carbon Trust UK. The decision taken at the international climate talks in Paris in December 2015 that food production must not be impacted when addressing the climate challenge is in line with EU and Government policy. Government must now ensure that Ireland's agri-food sector, which is the largest indigenous sector, is supported and developed.

### IFA requires:

- Balanced negotiations at EU level during 2016, which ensures that emission reduction targets for Ireland do not hinder the sustainable development of the sector or put a disproportionate burden on other sectors of the economy;
- The positive carbon sequestration contribution of agriculture must be fully recognised by supporting the development of a vibrant renewable energy sector and recognising carbon sinks such as pasture and forestry;
- The ammonia reduction targets set out in the EU Emissions Ceiling Directive must not limit the potential of the sector to grow.

## 3. Sustainable Farm Incomes – Key to Maximising Growth in the Agri-Food Sector

### Retailer regulation and viable output prices

In Ireland and at EU level, there is a major imbalance of power in the food supply chain between retailers on the one hand and processors, suppliers and primary producers on the other. The small number of large retailers clearly have excessive buying power and the ability to dictate prices levels back to farmers, often driving prices to uneconomic level and even below the cost of production.

While the Competition and Consumer Protection Act 2014 has begun to address the issue of retailer regulation the IFA has identified further policy actions:

#### IFA is seeking:

- Stronger legislation is required, including the introduction of an Independent Ombudsman to oversee and regulate the behaviour of retailers and to ban below-cost selling;
- Increased price transparency is required to improve the overall functioning of the market. This requires the introduction of an EU wholesale price reporting system for food produce, particularly in the meat sector;
- Legislation to provide for the disclosure of profits in the Irish market by large retail multiples which would improve transparency and re-balance bargaining power in the food supply chain.

#### Price Volatility

More than ever, farmers are exposed to the extreme price volatility of world commodity markets which is threatening the sustainability of family farm businesses.

#### IFA requires:

- Government agencies including Teagasc to take a leading role in the promotion of price risk management tools and the training of farmers in risk management;

- Pressure at EU level to overcome “State Aid” restrictions and allow the introduction of taxation instruments which are necessary to help farmers deal with income volatility.

### Input prices

Rapidly rising input costs – for feed, fertiliser and energy in particular – are threatening to undermine the profitability of farming enterprises. Action is required at national and EU level to strategically address input cartels particularly in the fertiliser industry and to strengthen farmers’ purchasing power in order drive down input costs.

#### IFA is seeking:

- Funding of new farm input purchasing groups and the upskilling of existing groups;
- Irish Government pressure for the instigation of a sector enquiry into the European fertiliser industry by DG Competition and the immediate suspension of customs and anti-dumping duties on imports of fertiliser from outside the EU;
- Government action to ensure that EU veterinary medicine regulations protect existing supply routes and provide a transparent and competitively priced single EU market for veterinary medicinal products;
- No further increase in the Carbon Tax, as this would further erode the competitiveness of the exporting agri-food sector;
- Government action to guard against any cost increases for oil prices arising from any change in status of the Whitegate facility;
- Abolition of the Joint Labour Committee for agricultural workers whose functions have been superseded by the introduction of primary legislation, the National Minimum Wage laws, and the Organisation of Working Time Act.

## Taxation Priorities

### Farm Taxation

IFA believes that the taxation system can play an important role in promoting investment and improving on-farm efficiency, encouraging timely farm transfers and overall, growing output at farm level, leading to increased earnings for the national economy.

#### IFA requires:

- Retention of 90% Agricultural/Business Relief and further adjustment of CAT exemption thresholds to reflect asset price increases of past two year;
- Increase in the self-employed Earned Income Tax Credit of €550 (introduced in Budget 2016) to come in line with the PAYE tax credit of €1,650;
- Further taxation measures to address the extreme income volatility now evident across the agricultural sector. To help achieve this, it is important that our Government insist on a review of EU state aid rules, which have hampered the development of taxation measures in this area;
- Reduction in the rates of Capital Gains Tax CGT and Capital Acquisitions Tax CAT which are too high and are proving a disincentive to investment and enterprise;
- Extension of the long term land leasing tax exemption scheme to leases between siblings in certain circumstances;
- Reintroduction of targeted rollover relief for capital gains arising from the disposal of farm land following CPO;
- Extension of SEAI accelerated capital allowances for investment in energy efficient equipment to sole traders. This is particularly relevant to the horticulture, pigmeat and poultry sectors;
- That land committed to Solar Farm installations is deemed as 'agricultural activity' and is thus eligible for EU Direct Payments, and qualifies for Retirement and Agricultural Reliefs.

Tax measures to promote economic activity and jobs in Rural Ireland

#### IFA is seeking:

- Introduction of tax-credits to encourage employers to take on apprentices and create sustainable employment in rural communities;
- Double tax relief on rental expenditure and concessions on commercial rates, to encourage businesses to locate in villages and town centres decimated during the recession.

## Farm Finance

Of the SME sector agriculture has the highest percentage of performing loans (loans not in default) which is in line with the positive economic performance of the sector in the post-crisis period.

However, with high interest rates and one of the highest levels of credit constraint for SME lending, Central Bank figures show the Irish banking environment remains uncompetitive and that Irish SMEs facing higher borrowing costs than their European counterparts particularly for smaller loans (loans less than €250,000, i.e. typical agricultural loans).

To help drive down the cost of finance to farmers, IFA requires:

- Further Government actions to increase competition in the banking sector and to improve oversight to ensure that access to more affordable finance is available for the performing primary agricultural sector;
- Securing low cost EIB funds for investment and development in the agri sector;
- A reduction in the high costs of registering a Legal Charge, which is preventing movement of customers and reducing competition;
- The greater availability of Strategic Banking Corporation of Ireland (SBCI) loans delivered competitively through all the commercial banks to farmers at real interest rate savings;
- Farmer representation on the governance board of the SBCI to reflect the fact that to date 32% of the €45m funds drawn down have been accessed by farmers. This represents 40% of SBCI loans to date. (€45m drawn down to July 2015 is out of a potential initial fund of €800m);
- Regulation that places a fixed fee on debit card payments above an agreed transaction amount. Currently debit cards are not a realistic payment service for merchants and marts where fees based on a % of typically larger transaction amounts prove prohibitively expensive.

## 4. Sectoral and Rural Development measures to improve Competitiveness

### Livestock sector

Teagasc farm income figures clearly show that profitability at farm level remains a major challenge for the low-income drystock sector. IFA is clear that Government must put the sustainable and profitable growth of livestock farms at the core of its strategy for the development of the meat and livestock sector which is of key importance to the agricultural sector.

In light of the recent proposed investment by ABP in Slaney Foods IFA requires:

- The Government must ensure that the Competition and Consumer Protection Commission guarantees primary producers full and open competition in the meat processing and rendering sectors. Alternatively the Government must introduce legislation to guarantee competition.

### Cattle

IFA requires:

- Additional direct payments to support the suckler cow herd, to reach a level of €200/cow per year;
- Delivery on the objectives and outcomes agreed in the Beef Forum, including further progress on specification, the proper operation of the QPS, increased age limit, greater availability of contracts, positive price incentives to reward quality production, improved controls on carcass trim and classification, price transparency, the establishment of producer organisations and support for live exports, including a resolution to the 30-day TB residency issue.

Beef Data and Genomics Programme (BDGP 2015 – 2020)

- Availability of the BDGP to all suckler farmers, with payments on all eligible animals.
- Immediate commencement of the work of the review group to implement necessary changes including greater flexibility on the 6 year rule, reduced genotyping requirements, accommodation of 3, 4, and 5 star animals and changes to the stocking rate restrictions.

Quality Assurance

- Improvement in the Bord Bia Quality Assurance Schemes involving proper rewards for all participants, fair and practical audits at farm level and a close out approach providing tolerances to allow issues to be rectified.

Branding

- The Government in conjunction with Bord Bia should develop a strong brand based on Ireland's grass-based production model which will deliver premium prices for Irish beef.

### Sheep

IFA requires:

- A targeted payment of €20 per ewe is required to maintain the national ewe flock;
- In addition, sheep farmers must have full access to the RDP schemes of Knowledge Transfer, ANCs, GLAS and TAMs.

### Markets

- Gaining access to markets such as the US and China as well as other growing markets are very important for the sheepmeat sector and must be prioritised.

### Sheep Identification and EID

- Farmers must not be subject to additional costs and bureaucracy and the derogation for lambs sent to slaughter must be maintained.

### Price Reporting

- The Department of Agriculture should introduce an accurate and transparent price reporting system for finished lambs at factory level.

## Dairy

The end of quotas in the dairy sector has brought significant new growth opportunities, but these come with extreme price volatility. Farmers have invested for the future, with close on €1.9b spent on farms since 2007, and another €1bn or so needed to deliver the industry target of a 50% increase in milk output by 2020. Government can assist farmers and the dairy sector to achieve growth targets with supportive policy initiatives, in order to ensure that it can deliver its full potential of additional jobs and export revenue.

### Dairy Forum

#### IFA is seeking:

- An active role for the Dairy Forum led by the Minister of Agriculture to ensure all industry stakeholders, including processors, but also banks, relevant state agencies, etc. prioritise the development of financial products, advice and other risk management instruments to support dairy farmers through extreme income volatility.

### Finance and Taxation

- The development of alternative sources of finance outside of the traditional banking sector, with tight regulations to protect farmers;
- Tax mechanisms to allow farmers put away funds in good years to be returned to their taxable income for investment purposes or when incomes are poor.

### Development and Infrastructure

- Supportive planning guidelines to provide for the on-farm development necessary to deliver fully on the growth potential of the sector.
- The development of the local infrastructure necessary to serve new and expanded dairy processing plants, which in turn will deliver additional employment and export revenue.

## Pigs and Poultry

Both the pig and poultry sectors have invested heavily over the last number of years in order to meet increasingly stringent environmental and welfare legislation. Government support is required to reduce the regulatory compliance burden imposed on farmers.

### Market, market support measures and marketing IFA requires:

- National funding to match the EU aid crisis fund for pig farmers;
- Re-opening of Russian markets for Irish pigmeat products.

### Labelling and promotion

- Changes to labelling legislative and effective enforcement to allow the extension of Country of Origin labelling to loose product as well as processed pig meat. This would give primary food producers a fair opportunity to differentiate their products to the consumer.
- Additional resources required to promote pigmeat on export markets.

### Investment

- Increase in the TAMS II investment ceiling to €300,000.

## Animal Health

Government policy must safeguard the high health status of the national herd that has been achieved by farmers through their investment in bio-security and compliance with stringent controls. However, farmers continue to bear an unfair and disproportionate burden of the costs of animal health policy and this must be rectified.

#### IFA requires:

- The savings accrued in the TB Eradication Programme must be utilised to provide payment of adequate compensation whilst there must also be the removal of unnecessary restrictions. This involves increased consequential loss payments for farmers to align the level of support with actual income foregone, payments for all animals removed, and an increase in live valuation ceilings;
- A properly funded Deer Management Programme to address the expanding deer population including a targeted programme surrounding TB outbreaks;
- Overhaul of the governance structure of Animal Health Ireland (AHI) to provide proper stakeholder representation at board level;
- A Department of Agriculture led and fully funded IBR programme to protect market access for our vital live export trade;
- A commitment to provide the financial resources necessary for a fair and equitable cost sharing Johnes control programme;
- A cost effective and competitive fallen animal collection/disposal service;
- EU animal health and welfare legislation must not impose increased costs, controls and inspections or unnecessary restrictions;
- A single EU licensing authority for veterinary medicines providing Irish farmers access to competitively priced medicines while protecting the existing supply routes;
- Maintenance of the regional veterinary laboratories structure and provision of increased resources to strengthen vital diagnostic and advice services for farmers.

## Grain

Maintaining and expanding a viable arable crop production sector in Ireland is critical to providing top quality cereals for our distilling and brewing industry and our indigenous livestock sectors.

#### IFA requires:

- Targeted grant aid for on-farm grain drying, storage and processing facilities, precision farming and low drift spraying equipment to maximise efficiency of nutrient use and increase the value added of primary production;

- A Renewable Heat Incentive RHI grant to fund the installation of biomass grain dryers;
- Funding for biomass trade centres to enable the mobilisation of biomass crop residues;
- Support for the establishment of machinery rings.

## Potatoes and Horticulture

#### IFA requires:

- Annual Funding of €8m for the Scheme of Investment Aid for the Development of the Commercial Horticulture Sector which must be extended to include potatoes;
- Simplification of reporting and compliance to enable draw down of funding for Producer Organisations.

## Forestry

The forest sector comprising the growing, harvesting and processing of forest products contributes €2.3bn to the Irish economy and creates over 12,000 jobs, predominantly in rural areas. Irish forests will sequester in excess of 4.8 million tonnes of carbon by 2020 making an important contribution towards meeting our climate change targets. The Forestry Programme 2014 – 2020 provides a vital support structure to achieve national policy targets in afforestation and the mobilisation of the private timber resource.

#### IFA requires:

- Full drawdown of the funding in the remaining 5 years of the Forestry Programme to 2020;
- Supports for existing forest owner groups to encourage mobilisation and realise the economic potential;
- Under the afforestation scheme the grant to plant marginal land (GPC1) must cover the full cost of establishment and the premium rate must compensate the farmer for agricultural income foregone in accordance with the RDP;
- The establishment of a Forestry Trade Forum by the Minister to increase transparency and achieve the timber production targets;
- The Forest Service to honour its commitment not to recoup overpayments arising from the initial digitisation of forest areas onto the Forest Service payment system. This commitment accepted that the mapping errors were genuine and resulted from advances in mapping technologies;

- The Forest Service to limit the period of recoupment of overpayments relating to mapping errors under their control checks to a maximum of four years in line with EU regulations;
- Removal of the afforestation ban and the reduction of management restrictions within the SPAs. The Hen Harrier Threat Response Plan must recognise that responsible forest management practices and hen harrier conservation are compatible.

## Aquaculture

### IFA requires:

- Government to act swiftly on the *Food Wise 2025* commitment to review aquaculture licensing;
- The provision of capital support under the European Maritime and Fisheries Fund (EMFF) to sustainably develop production, provide adequate disaster compensation and the scope to increase self-sufficiency in juveniles and seed stock for all aquaculture licence holders and renewal applicants;
- The maintenance and improvement of all shellfish growing waters to "A" class standards by investment in coastal waste water treatment plants.

## Equine

IFA supports the principle of the foal levy and recognises the need to support the industry for all breeders, through the various beneficiaries. While changes made to the foal levy bands in recent years were welcome, there remains outstanding breeder issues on the levy.

The Irish Equine Centre provides an invaluable service in protecting the disease free status of the Irish horse industry and requires continued State support.

### IFA requires:

- That the foal levy be collected on the actual stallion fee paid by the breeder;
- Continued State support for the Irish Equine Centre which provides an invaluable service in protecting the disease free status of the Irish horse industry.

## Rural Development Programme 2014 – 2020

The RDP provides a vital support structure through a wide range of schemes benefiting farmers across the country. The allocation of EU and National funding to the programme is in excess of €4bn.

### IFA requires:

- Full drawdown of the funding in the remaining five years of the programme to 2020;
- Flexibilities to ensure that funding can be reallocated depending on the demand for various measures;
- In the EU CAP mid-term review 2017, the RDP must be assessed in relation to funding requirements and where necessary, additional exchequer resources must be provided;
- Additional State funding to measures such as ANC payments.

## GLAS

### IFA requires:

- A €250m annual funding allocation for agri-environment schemes;
- The reopening of the GLAS scheme in early 2016 to ensure 50,000 farmers can join the scheme;
- Greater flexibility to make the scheme more attractive to farmers;
- Flexibility on commonages to ensure that farmers can maximise their payments;
- In a mid-term review of GLAS the cap of €5,000 must be increased.

## Targeted output Agri-Environmental scheme

### IFA requires:

- The implementation of the targeted output Agri-Environmental scheme (in addition to the Burren) to complement existing environmental programmes in areas such as Hen Harrier, Pearl Mussel, Upland Areas, Shannon Callows and other designated areas.

## Areas of Natural Constraint (formerly Disadvantaged Areas)

IFA is seeking:

- Reversal of the cuts to payment rates and number of qualifying hectares in recent budgets to restore the ANC scheme and ensure it achieves its target of maintaining farming and economic activity across Ireland, including marginal areas;
- A commitment in the ANC review that existing areas will not lose out and that the funding allocation is increased.

## TAMS II

IFA is seeking:

- Administration of TAMS II in a prompt and timely fashion recognising the fact that many sectors have a narrow period in which to carry out significant building work on their farm;
- Expansion of the list of eligible items for grant aid to include grain storage, sheep fencing underpasses, meal bins, land reclamation and internal road infrastructure.

## Knowledge Transfer and Education

### Third Level Student Grants

The Government Commissioned report, "Funding Irish Higher Education: A Virtuous Circle of Investment, Quality and Verification" makes a number of new proposals to address the issue of funding at third level, including a new loan scheme and changes to the assessment process for Student Universal Support Ireland SUSI grants. Proposals as outlined would disproportionately affect those from rural and agricultural backgrounds, deter them from applying to college, and widen the gap between urban and rural opportunities.

The sectors impressive performance and associated increased employment opportunities have resulted in a huge surge in enrolment numbers in agricultural and agri food courses.

IFA requires:

- Government to ensure equality of access to third level education for low income farm families to fully deliver on the potential and growth opportunities in the sector.

- Any changes to the funding structure for third level education must not result in children from low income farm families being excluded from accessing third level grants.

### Discussion Groups

The extension of the discussion group model across different sectors as an effective means of knowledge transfer has been a positive initiative over the last five years. The continued growth of KT programmes, and their extension to all sectors, is an important element of the new RDP and will contribute to greater on-farm efficiency and competitiveness.

IFA requires:

- Knowledge transfer schemes to be available across all sectors, maximising the payment to farmers, including accommodation of mixed farming enterprises;
- No charging of farmer participants for Veterinary fees in KT programmes.

### Leaving Certificate Agricultural Science

The current development of the Leaving Certificate Agricultural Science specification must result in an industry relevant syllabus which best equips new entrants with appropriate knowledge and skills. Government must also meet the increased demand for third level places in agricultural courses.

IFA requires:

- Provision of the necessary resources to train and upskill teachers who will deliver the new Agricultural Science specification for Leaving Certificate students which is due to be introduced in September 2017;
- Embedding of farm safety principle and practice in all aspects of the new Agricultural Science specification;
- Sufficient places in agricultural colleges to meet demand;
- Means testing for third level grants to continue to be based on taxable income.

## Designated land

The imposition of environmental designations on farmers' land has resulted in significant restrictions on farming activities and other developments. When designations were first imposed, commitments were given that compensation would be paid where farmers suffered losses, however in recent years these have not been properly honoured.

### IFA requires:

- the negotiation during 2016 of a new agreement for the implementation of SACs including proper consultation, a workable and truly independent appeals system and full compensation where restrictions are imposed;
- the National Parks and Wildlife Service (NPWS) Farm Plan Scheme to be available to all farmers who have a designation imposed on their land and the new agreement on SACs to be implemented before end 2016.

## Rural Walks Scheme

### IFA is seeking:

- A doubling in the funding of the Rural Walks Scheme from €2m to €4m to increase the number of walks covered from 40 to 80.

## Leader

### IFA requires:

- Local Community Development Companies, which will operate the new Leader programme at local authority level prioritise support for on farm projects given the need for further diversification.

## Environment

### Hedge cutting and Gorse burning

#### IFA is seeking:

- The decision by the Minister for the Arts, Heritage and the Gaeltacht to allow for more flexible hedge-cutting dates must be fully honoured;

- The changes in the gorse burning dates to include April, must be fully honoured.

### Water abstraction

- Full compensation for any income losses or property devaluation must be paid.

## Renewable Energy

Ireland faces a significant challenge to meet our environmental commitments on renewable energy generation and emission reductions. A number of policy actions need to be taken address these challenges and to ensure the sustainability and growth of agriculture into the future.

### IFA is seeking:

- Investment in farm-level renewable energy which has the potential to contribute to our economic recovery through employment creation particularly in rural areas, reducing carbon emissions and stabilising energy costs by increasing security of supply;
- Ring fencing of carbon tax revenues to be reinvested in funding for renewable energy projects;
- The establishment of a high level task force, chaired by an independent chairperson and with representation from the various departments to coordinate policy formulation and implementation in the area of Renewable Energy;
- Front loading of any Renewable Heat Incentive scheme to promote the establishment and adoption of new technology;
- A Renewable Heat Incentive tariff to support the development of a renewable heat market:
  - 13c/kWth for small commercial biomass (up to 500kWth)
  - 8c/kWth for medium commercial biomass (less than 1MWth)
  - 1.5c/kWth for large commercial biomass (1MWth and above).

### Community renewable energy

To date the majority of renewable energy projects developed in Ireland have been driven by the corporate sector. Their scale and strategy have left many communities divided and opposed to renewables. Community based renewable projects

can, if developed properly, have a real lasting benefit for communities.

**IFA is seeking:**

- Tariff premia and grid exemption for renewable projects where communities have an opportunity to be shareholders in the projects;
- That land used for renewable energy production be eligible under the basic payment scheme;
- That Investment in farm-scale renewable energy initiatives qualify under the Employment and Investment Incentive Scheme;
- Income tax exemption on income received from the alternative use of farmland for renewable projects, where such income is used for the purposes of re-investment in farm businesses;
- Increased tariffs for roof-mounted solar.

**Bioenergy and Biomass**

- Grant aid for the development of biomass trading centres for the grain and forestry sectors, and support for the establishment of ESCOs (Energy Supply Companies) by groups of farmers.

## 5. Rural Services and Infrastructure

### Broadband

Government must deliver on the commitment to provide a high speed, fibre broadband network across rural Ireland to support homes and businesses, job creation, investment and rural development.

#### IFA requires:

- Rapid roll-out of the rural broadband scheme to ensure that every home, school and business in rural Ireland has access to high-speed fibre broadband;
- Delivery of a minimum broadband speed of 30Mbps to all premises by 2020 in line with commitments under the scheme;
- Delivery of universal service obligations and charges to maintain and develop the fixed line infrastructure for all rural customers.

### Post Offices

- Development of new services through the Post Office network and no further closures of rural Post Offices which are essential to the fabric of rural communities.

### Water charges

- No additional costs to farm enterprises arising from changes in the charging regime for non-domestic water.

### Rural Roads

- An increased and ring-fenced annual rural roads budget as part of a planned repair and maintenance programme.
- The reinstatement of a fully funded Local Improvement Scheme by the Department of Transport and local authorities to support the maintenance and repair of non-local authority roads.

### Development Charges

- Removal of any obligations on farmers to pay development charges, where building is taking place to comply with new or existing legislation.

### Rural Planning

- A review of Building Regulations to reduce unnecessary compliance costs for farm families who wish to live and work in their local communities.

### Litter

- Repeal of current legislation which penalises farmers on whose lands litter is being dumped;
- Increased fines and greater enforcement by local authorities to tackle the scourge of littering by passing motorists and users of the countryside.

### Electricity Infrastructure

- Utilities including EirGrid and ESB must respect the rights of landowners, not pre-empt the planning process and must put forward all options, including undergrounding of powerlines before An Bord Pleanála, for all projects including the proposed North-South 400kV interconnector.

### Crime Prevention

- Enforcement of the scrap metal legislation, enacted in 2014 following lobbying by IFA, which must be led by the Department of the Environment so that criminals who steal from rural dwellers are prosecuted by An Garda Síochána;
- Increased inspection to ensure all scrap metal dealers keep proper records and seek proof of identity from suppliers;
- Extension of the Seniors Alert scheme to cover the installation of house alarms;
- Increased Garda policing hours and presence in rural areas to reduce crime and create a greater sense of security in the countryside;
- Support for the establishment of IFA's National Text Alert service in partnership with An Garda Síochána;
- Support for the installation of CCTV in Local Villages at locations that would assist in crime prevention and detection.

- Development of Electronic Tagging / Monitoring procedures to address the areas of detention, restriction and surveillance of repeat criminal offenders.

#### Greenways

- Full consultation must take place with landowners before Greenways are developed in rural communities. All options must be explored during this consultation to limit negative impacts and secure community and individual farmer agreement on location.

#### Rates

- Incentives for new business start-ups such as exemptions from rates for an initial time period to encourage innovation and enterprise in rural communities.

#### Dog Attacks

- Government through the Departments of Agriculture and the Environment to fund a comprehensive PR campaign including TV advertising on responsible dog ownership in order to prevent unnecessary and avoidable losses to farmers.
- Support for dog wardens to improve policing of dog control and identification issues.

#### Flooding

- Implementation of effective Catchment Flood Risk Assessment and Management plans which involve essential river maintenance for the protection of farm land and rural communities from the increased regularity of flooding events.
- The establishment of a single body to deal with flood management and river maintenance.

## 6. Other Policy Issues

### Farm Safety

Farm safety is a top priority for the Association and through campaigns such as SAVE LIVES it takes a proactive role in promoting safe work practices. It is the IFA's position that awareness and education programmes together with supports to improve safety standards on farms are the most effective way to reduce farm accidents.

#### IFA requires:

- Farm safety inspections are not linked to cross compliance under the Basic Payment Scheme;
- Occupational Health and Safety to be included as an exam module in University and Agricultural colleges to change farm safety behaviour;
- Introduction of a PTO scrappage scheme to support farmers to replace old PTO shafts with new safer models.

### Fair Deal Scheme

While IFA supports and encourages lifetime transfers of farms, the current rules of the Fair Deal scheme can destroy the viability of the family farm business by burdening families with excessive care costs, where the asset has not been transferred or where it has been transferred within the previous 5 years. The key concern for farm families remains the potentially uncapped liability for non-residential farming assets in these circumstances.

#### IFA requires:

- There should be a cap on the maximum % charge that can be applied to non-residential assets, in all circumstances. This would provide certainty for farm families and allow them to make the most appropriate decision in meeting the costs of care;
- Where a transfer has been made, but within the previous 5 years, there must be a clear limit set on the % of the value of that asset that can be charged against the cost of care of the former owner.

- Clearer guidelines must be issued to determine 'sudden illness or disability'. The interpretation must also be broadened to include those who have been cared for at home for a relatively short duration, but subsequently require care.

### Farm Assist

#### IFA requires:

- Government to reinstate income disregards under the Farm Assist scheme which provides a vital support to low income farm families, underpinning production and economic activity.

### Rural Social Scheme

#### IFA requires:

- The Rural Social Scheme to be increased from its current number of 2,600 to 4,000 places with flexibility on eligibility criteria to accept low income farmers outside Farm Assist in order to deliver specific community projects.

### Social Inclusion and Community Activation Programme (SICAP)

#### IFA requires:

- Low income farmers to be included as a target group for support under SICAP.

### Regulation of lobbying

#### IFA requires:

- Simplification and reduction of the compliance burden for registered lobby representatives;
- Access to Leinster House for registered lobbyists, similar to access available in the European Parliament;
- Introduction of similar registration obligations for unregistered groups (who have no employees).



