

2021 Budget Submission

The Irish Farmers' Association July 2020







Table of contents

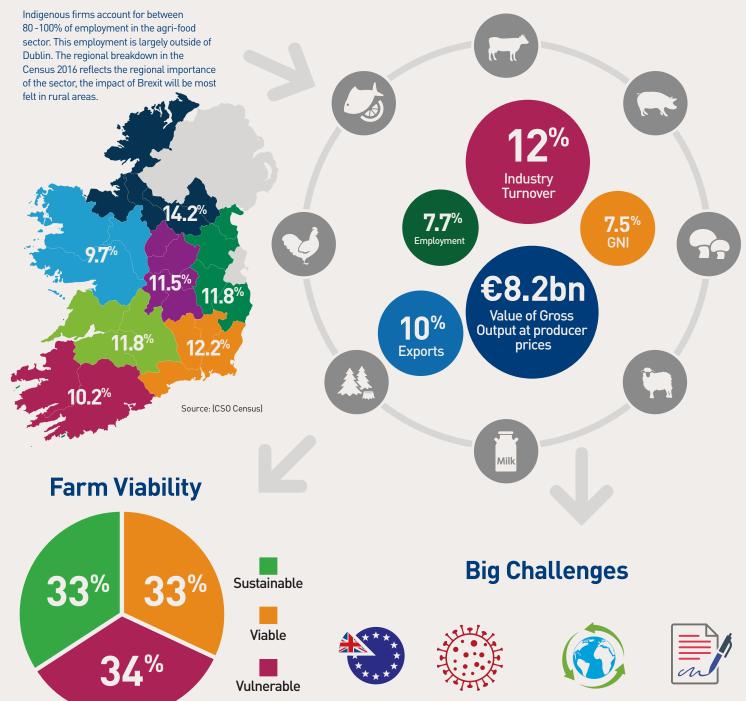
	Value of Agri-Food Sector	2
	Exports and our Markets	3
	Dependency on Direct Payments	3
1.	Expenditure Measures to Support Farm Enterprises	5
1.1	Farm Schemes	5
1.1.1	Suckler Cow	5
1.1.2	Sheep Welfare Scheme	6
1.1.3	Agri-Environment Schemes	6
1.1.4	Areas of Natural Constraints (ANCs)	6
1.1.5	Designated Area Payments	6
1.1.6	Organic Farm Scheme (OFS)	6
1.1.7	Knowledge Transfer (KT)	6
1.1.8	Producer Organisations (POs)	7
1.1.9	Walks Scheme	7
1.1.10	LEADER	7
1.1.11	Targeted Agricultural Modernisation Scheme (TAMS)	7
1.1.12	Tillage	7
1.2	Supporting Farmers through Brexit and COVID-19	8
	IFA Position on EU-UK Negotiations	8
1.3	Climate Action	9
1.4	Renewable Energy & the Bioeconomy	9
1.5	Banking	10
	COVID-19 Market Disruption Support / COVID Credit Guarantee Scheme	10
1.6	Farm Forestry	11
1.7	National Food Ombudsman	11
1.8	Horticulture	11
1.9	Animal Health	11
1.10	Aquaculture	12
1.10.1	COVID-19 Market Disruption	12
1.10.2	Implementation of Aquaculture Licensing Review Recommendations	12
1.10.3	Blue Carbon Potential	12
1.11	Social Protection	12
1.11.1	Farm Assist	12
1.11.2	Fair Deal and Support for Older People	13
1.12	Farm Safety	13
1.13	Road Development	13

2.	Taxation Measures to Support Growth & Restructuring	15
2.1	Farm Transfer, Succession and Partnerships	15
2.1.1	Rates of Stamp Duty	15
2.1.2	Reliefs for Stamp Duty	15
2.1.3	Ceiling for Young Trained Farmer Stamp Duty Relief	15
2.1.4	Agricultural/Business Relief & Capital Acquisitions Tax (CAT) Values	15
2.1.5	Collaborative Farming Partnership Fund	16
2.1.6	CGT Entrepreneur Relief	16
2.1.7	Interaction of CGT Entrepreneur Relief & CGT Retirement Relief	16
2.1.8	Agricultural Relief – Removal of Individual Qualifying Criteria	16
2.1.9	Forestry & CAT / Stamp Duty Reliefs	16
2.1.10	Extending 10-year Ownership and Usage Period for CGT Retirement Relief to Spouse for Lifetime Transfers	17
2.2	Income Volatility	17
2.2.1	Income Averaging 'Step-Out' flexibility	17
2.2.2	Agricultural Rainy-Day Fund	17
2.3	Removing Discrimination in the Tax System	18
2.3.1	Earned Income Tax Credit	18
2.3.2	Universal Social Charge (USC) for the Self- Employed	18
2.3.3	Vaccines and Herd Health Products	18
2.3.4	Tax Treatment of Payments Received for Use of Forestry Land by a Third Party	18
2.4	Environment	18
2.4.1	Carbon Tax Exemption on Agri-Diesel & Other Agri-Fuels	18
2.4.2	CGT / CAT Reliefs – Solar Leases	18
2.4.3	Green Tax Credit	19
2.4.4	Accelerated Capital Allowances for Emission Efficient Equipment	19
2.4.5	Farm Safety Incentive and Employee Flat-Rate Expenses	19
2.4.6	Carbon Tax Relief	19
2.4.7	Excise Duty on Fuel	20
2.4.8	Sugar Sweetened Drinks Tax (SSDT) and Healthy Eating	20

Value of Agri-Food Sector

Regional Employment

Economic Contribution 2019



Source: (Teagasc 2019)

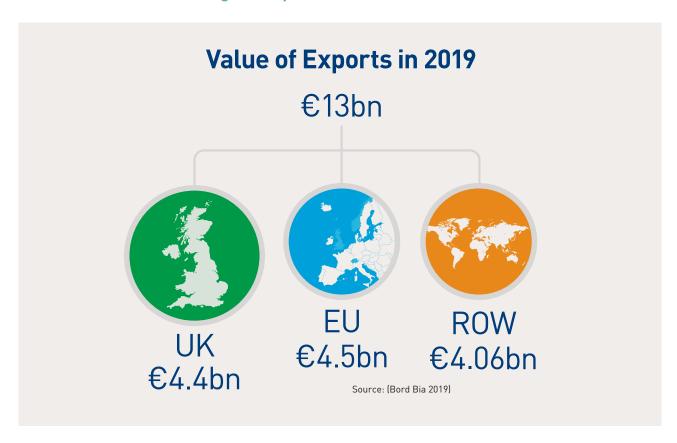
Brexit COVID-19

Environment

CAP

Exports and our Markets

The value of Irish agri-food products remain strong. In 2019 the sector represented approximately 10% of the value of our overall exports at €13bn. The UK remains a strong market with 34% of all our agri-food products destined for the UK market.



Contribution of Direct Payments

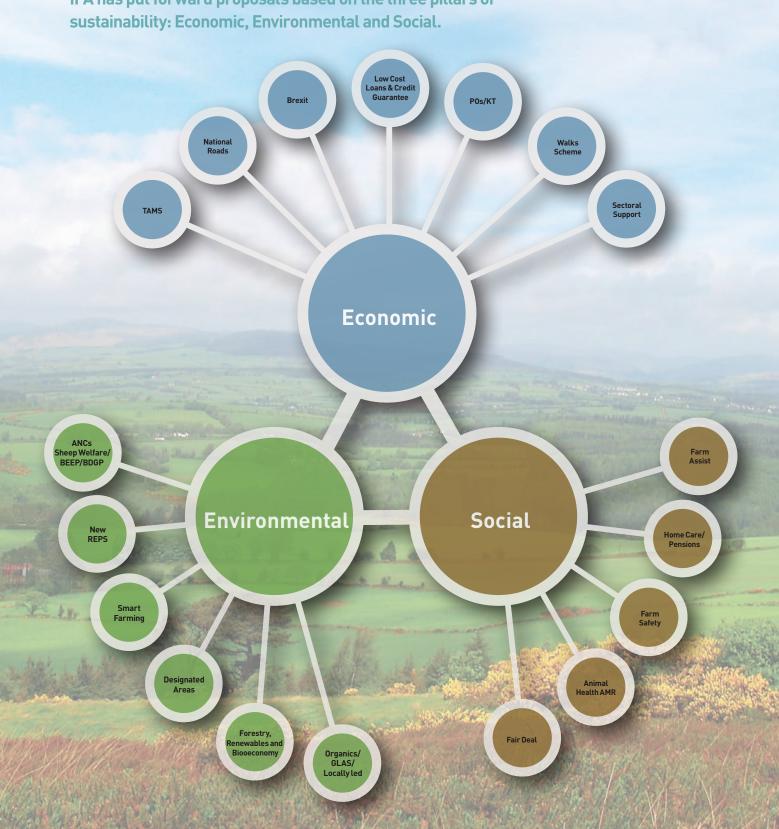
Table 1. Contribution of Direct Payments.

	FFI €	DP €	FFI contribution of DP %
Dairy	65,765	20,387	31
Cattle Rearing	9,191	14,706	160
Cattle Other	13,899	17,930	129
Sheep	14,630	19,312	132
Tillage	34,255	25,349	74
All	23,964	18,452	77

Source: Teagasc National Farm Survey 2019.

Expenditure Measures

IFA has put forward proposals based on the three pillars of



1. Expenditure Measures to Support Farm Enterprises

1.1 Farm Schemes

The Government must invest in agriculture and support farm incomes and viability by providing the **maximum permissible level of national co-financing** in the CAP Rural Development Plan post 2020. Following agreement on the MFF¹, Ireland can now co-finance Pillar II schemes up to 57%. It is vital that the Government provides this level of co-financing. The commitment in the Programme for Government *Our Shared Future* for a "new REPS-2 Programme", must be in addition to

the national co-financing commitment from the Government.

IFA proposes:

 The total annual CAP payment plus the national cofinancing must amount to €2bn per annum, from the current level of €1.8bn from when the new CAP starts.

Table 2. IFA Funding Proposals for Farm Schemes 2021.

	€m 2020			€m 2021			
Farm Schemes	EU Contribution	National Contribution	Total Expenditure*	EU Contribution	National Contribution	Total IFA Proposal	
Beef Data Genomics Programme (BDGP)	24.3	20.7	45	48.6	41.4	90	
Beep Environmental Efficiency Programme- Suckler (BEEP-S)	-	35	35**	-	52	52	
Sheep Welfare Scheme	10.2	6.8	17	41.58	35.42	77	
Areas of Natural Constraints (ANCs)	158	92	250	162	138	300	
Targeted Agricultural Modernisation Scheme (TAMS)	44.5	38	82.5	64.8	55.2	120	
Agri-Environment incl GLAS & Locally led	118.8	101.2	220	118.8	101.2	220	
"New REPS-2 Programme"	-	-	-	=	150	150	
Organic Farm Scheme	6.5	5.5	12	6.5	5.5	12	
NPWS Farm Plan	-	1	1	-	10	10	
Walks Scheme	-	4	4	-	6	6	
Knowledge Transfer	10.3	8.7	19	10.3	8.7	19	
Producer Organisations	-	0.1	0.1	-	5	5	
LEADER	16.2	13.8	30	16.2	13.8	30	
Total National Contribution		326.80			622.22		

^{* 2020} figures are based on IFA expenditure estimates. ** Allocation for 2020 - increase required to take account of additional applications.

1.1.1 Suckler Cow

The national suckler cow herd of almost 1m head is critically important to the high-quality Irish beef sector. The suckler beef sector also delivers essential socio-economic and environmental services and public goods, as well as providing a major carbon sink.

The support schemes for the suckler cow BDGP and Beef Environmental Efficiency Pilot (BEEP) have proven to be essential in terms of economic support and in improving efficiencies on environmental performance and delivery.

IFA proposes:

 Suckler farmers need a targeted payment of €300 per cow, facilitated by a combination of CAP and national funding.

- For 2020, a total of 27,000 suckler farmers have applied for the BEEP-S scheme, with up to 600,000 cows. At the payment rates of €90 on the first 10 cows and €80 on the remainder, the funding costs of this scheme will be up to €52m in 2020, as opposed to the €35m allocated in October 2019. This means this scheme will need a budget injection of an additional €17m for 2020.
- For 2021, the IFA is proposing the BDGP is renewed and simplified with funding increased from €45m to €90m pa.
- This would provide total funding of €142m pa for sucklers (BDGP €90m and BEEP-S €52m) and enable payment rates of €290 per cow on the first 10 cows and €250 per cow on the remainder.
- An enhanced environmental scheme must be introduced to acknowledge the carbon sink provided by agriculture and to support vulnerable sectors like sucklers.

1.1.2 Sheep Welfare Scheme

With 34,000 flock owners, sheep farming is the second largest sector in terms of farm numbers. The sector has an output of €450m with exports of 55,000t to 35 different countries. The Sheep Welfare Scheme has been very positive and effective; sheep are major contributors to environmental preservation, particularly in hill and mountainous areas. The four-year scheme is due to conclude in December 2020.

IFA proposes:

 A targeted payment of €30 per ewe through a combination of CAP transition and national funding is needed for sheep farmers. Across the national flock of 2.57 million breeding ewes, this would require total funding of €77m pa.

1.1.3 Agri-Environment Schemes

Farmers are fully committed to improving the **environmental and economic sustainability** of their farming enterprises, contributing to the enhancement of the environment and increased amenity value of the countryside.

An important programme within the current RDP² is the GLAS³, in which up to 48,000 farmers are now participating in. At the end of 2020, 36,000 will finish their GLAS 1 & 2 contracts. It is vitally important that all farmers are given the option to extend their contracts for one or two years under EU transitional rules. Also, under EU transitional rules it is possible to bring in additional farmers under short contract.

IFA proposes:

- The GLAS scheme must be reopened for all farmers who are currently denied entry. This includes new entrants since 2015 as well as the 2,000 farmers who were in AEOS⁴ whose contracts finished in 2018.
- For the 36,000 farmers finishing GLAS on December 31st 2020 their plans must be extended for up to 2 years or for the period of CAP transition, and all payment rates must be maintained.
- €232m funding allocation is required for all environmental and locally led schemes, including GLAS, the Burren, Hen Harrier and Organic Schemes.

1.1.4 Areas of Natural Constraints (ANCs)

Additional allocations over the past two Budgets reversed 2009 cuts incurred. The ANC payment is worth €250m to nearly **100,000 farmers** following the 2019 review. However, it is vitally important that the allocation to the ANCs is increased to take account of the low farm incomes.

IFA proposes:

 Funding for the ANCs must be increased by a further €50m to bring the total budget for the scheme to €300m.

1.1.5 Designated Area Payments

Payments through the National Parks and Wildlife Service (NPWS) for land under SACs⁵ and SPAs⁶ through the Farm Plan Scheme must be reopened. This scheme meets the costs of restrictions imposed and provides adequate compensation to farmers whose incomes and livelihoods have been negatively affected by designation. This is particularly relevant to the Shannon Callows, Hen Harrier and hill land areas where there are severe farming and other developmental restrictions. The increased allocation of €0.5m in Budget 2020 must be built upon.

IFA proposes:

 Additional funding of €10m must be allocated to the NPWS to pay farmers where restrictions to farming result from the designation of land.

1.1.6 Organic Farm Scheme (OFS)

The Organic Farm Scheme assists farmers in the conversion process to organic farming. In 2019, the funding for the scheme was increased to €12m and a development fund of €1.2m was put in place. Despite this, applicants to the scheme were rejected. Given the current proposals to extend the area of organics in the *Farm to Fork Strategy* the budget must be maintained. The OFS re-opened for a short period in late 2018, it is now closed. There is potential to increase the number of conversions to reach consumer demand. 72,000ha of land are under organic production in Ireland, up some 50% since 2014.

IFA proposes:

- Funding of the Organic Farm Scheme must be maintained at €12m and transitional arrangements put in place, given the current proposals under the Farm to Fork Strategy.
- An additional payment on the first 3ha of organic horticulture. There is a clear growing market and demand for organic fruit and vegetables that will return a margin.

1.1.7 Knowledge Transfer (KT)

With the existing KT programme finished since 2019, transitional arrangements are required in 2021 and 2022 to maintain the scheme in advance of the next Rural Development Programme.

- 2 Rural Development Programme
- 3 Green Low-Carbon Agri-Environment Scheme
- 4 Agri-Environment Options Scheme
- 5 Special Areas of Conservations
- 6 Special Protection Areas

IFA proposes:

 To support increased participation by farmers in KT programmes across all sectors, funding of €19m is required. This would allow an extension of the KT programme for 2021 and allow additional participants into the scheme.

1.1.8 Producer Organisations (POs)

Recognition of POs across all sectors was provided for in the CAP reform 2014-2020, with a specific measure to support the set-up of producer groups and organisations, included in the RDP. The DAFM⁷ has provided a small level of support to cover some of the legal and advisory costs of facilitators associated with the establishment of beef POs, up to a maximum of €3,000. The current rules are too bureaucratic and need to be **more farmer friendly**, and significant additional funding is required for the establishment and ongoing running costs of beef POs.

In addition, the DAFM initiative to establish new POs within horticulture, to include the potato and nursery stock sectors, should continue to be supported.

IFA proposes:

 €5m must be provided to assist farmers with the establishment and ongoing running costs of POs.

1.1.9 Walks Scheme

The Walks Scheme has a significant impact on the development of recreational activities, boosting rural tourism and supporting farmers who provide access to their land. There is a commitment in the Programme for Government *Our Shared Future* to develop a new Outdoor Recreational Strategy to include extending the Walks Scheme to achieve a target of 80 trails, currently at 40.

IFA proposes:

• The number of trails must be extended to 120, with additional funds of €2m to bring it to a total of €6m.

1.1.10 LEADER

The LEADER Programme plays an important role in supporting the rural economy particularly in enterprise development. This is particularly relevant in the context of the recovery of rural areas post COVID-19 restrictions. Of particular concern is that the current LEADER Programme concludes at the end of 2020. It is important that in the context of EU CAP transition rules that funding is maintained for 2021 and support to projects is maintained.

IFA proposes:

 The LEADER Programme be fully funded for 2021, with no gap in this funding before the start-up of LEADER in the next RDP.

1.1.11 Targeted Agricultural Modernisation Scheme (TAMS)

The implementation of a strong on-farm investment scheme is critical given the ambitious growth targets set out in *Food Wise 2025*. There is an **ongoing investment requirement across** all sectors, to improve efficiency and meet higher environmental and animal welfare standards. Expenditure on TAMS is currently behind target, with approximately 60% of the allocation of €395m spent to date. There needs to be increased flexibility and the addition of extra items to ensure funding is drawn down.

IFA proposes:

- An allocation for TAMS for 2021 must be set at €120m. It
 is necessary to meet all outstanding commitments and
 new applications for 2021 under EU CAP transitional
 arrangements.
- Additional items must be added to include grant aid for road underpasses, weighbridges and rubber mats.
- There needs to be a separate investment limit for solar panels, similar to LESS⁸ and the ceiling for LESS needs needs to increase.
- In the context of fencing in inaccessible hill areas, the standard costings must reflect the increased cost in sheep fencing and of transporting materials to the site.
- The investment limit for the Pig and Poultry Investment Scheme (PPIS) increased to €200,000 per farmer announced in 2019 must be implemented as soon as possible.
- The minimum investment limit of €2,000 must be lowered to accommodate small investments.
- The standard costings must be adjusted in line with increased costs of building material, machinery and labour.

1.1.12 Tillage

Tillage farmers are experiencing a continual decline in their incomes, which has resulted in a 20% reduction in the tillage area since 2008. Targeted supports must be put in place to ensure the **revitalisation** of this important sector, which underpins Ireland's export orientated livestock, dairy and drinks sectors.

IFA proposes:

 There must be greater flexibility in farm schemes so that tillage farmers qualify for higher grant rate payments, particularly in relation to any new schemes, similar to the existing TAMS and GLAS schemes which were introduced under the CAP Pillar II.

⁷ Department of Agriculture, Food and the Marine

⁸ Low Emission Slurry Spreading Equipment Scheme

1.2 Supporting Farmers through Brexit and COVID-19

The impact of Brexit continues to have a damaging effect on the price of agricultural goods. Once again, the **risk of a no-deal Brexit** is real, with both sides reporting little or no progress in the current EU-UK negotiations on the future relationship.

Meanwhile, the UK has also opened trade talks with the United States which is seeking lower tariffs and increased access to the UK food market, including the accommodation of US production standards in the areas of food safety, animal health and the environment. The impact of a no-deal with the EU and/or a US-UK trade deal would be a disastrous scenario for Irish agriculture.

Beef farmers in particular have suffered **severe income losses** due to Brexit. In May 2019 this was recognised by the EU and the Government in the announcement of a €100m support scheme covering losses since September 2018, which was later introduced as the BEAM⁹.

Since January 2020, beef finishers have continued to encounter Brexit-related price losses. However, from mid-March finishers suffered a double blow as market disturbance caused by COVID-19 compounded their price losses. Using the same methodology as for the BEAM, IFA has calculated that the beef price losses from Jan 1st to July 5th 2020 at €163m. The Government response of a €50m Beef Finishers Pandemic Payment (BFPP) Scheme is very welcome, but not fully adequate to cover the combined losses from Brexit and COVID-19 market disturbances during this period.

Since the BEAM scheme, IFA calculates the beef price losses as a result of Brexit and COVID-19 market disturbances as follows: Brexit price losses from 11th May to 31st Dec 2019 €160m; Brexit and COVID-19 price losses from 1st Jan to

5th July €163m less Government Beef Finishers' Pandemic Payment of €50m. This leaves total net beef price losses from Brexit and COVID-19 at €273m.

IFA proposes:

- Full compensation for any losses during Transition Period arising from Brexit uncertainty, sterling volatility and COVID-19 impact, across all sectors.
- Full compensation for beef price losses since the end of the period covered by the BEAM scheme on 12th May 2019 involving the following:
 - €160m from 12th May to 31st Dec 2019.
 - €113m from 1st Jan to 5th July 2020 (€163m losses less €50m pandemic payment).
 - On-going losses estimated at €6m per week.
- The allocation of a €5bn Brexit Adjustment Reserve Fund as part of the EU Recovery Fund is welcome. However, this may not be sufficient and must be scaled up as necessary to deal with all scenarios including the possibility of no deal, ie to provide for direct payments to farmers to fully compensate for the reduced value of the UK market, in addition to market support measures and longer term structural and adjustment funding.
- Further strengthening of the Government's Brexit contingency fund announced in Budget 2020, which allocated €110m to Agriculture, so that these funds are supplemented in Budget 2021.

9 Beef Exceptional Aid Measure

IFA Position on EU-UK Negotiations

IFA wants the closest possible future trading relationship that maintains the value of the UK market for Irish farmers, which in turn will ensure the stability of the EU food market.

We have three objectives:

- 1. Tariff-free and quota-free access to the UK market.
- 2. **Level playing field** whereby the UK maintains corresponding standards on food safety, animal health, environment, etc.
- 3. No return by the UK to a cheap food policy, so that their external tariffs and import quotas for sensitive products such as beef, butter and lamb do not undercut the EU.

For Great Britain trade to Northern Ireland, IFA also requires close SPS¹⁰ and customs checks and controls on all live animals and agri-food products.

Northern Ireland must not become a back-door into the EU for UK's sub-standard food imports.

1.3 Climate Action

Irish farmers are fully engaged and committed to climate action. All farmers in receipt of a basic payment maintain their land in Good Agricultural and Environmental Condition (GAEC) across a range of areas, with almost 50,000 farmers also participating in the GLAS Scheme. This demonstrates how farmers respond positively to properly focused and funded climate initiatives.

IFA acknowledges the commitment in the Programme for Government *Our Shared Future* to build on Ireland's carbon efficient food production model and the Government commitment to introduce a "new REPS-2 Programme" fully funded from the National Exchequer. A pilot of this scheme should be provided for in Budget 2021.

IFA also notes the commitment in the Programme for Government to introduce a new Climate Bill. It is crucial that this Bill takes an incentive-based approach towards achieving climate targets and that it is backed by appropriate funding.

IFA proposes:

- Funding is required to introduce a Sustainable
 Development Programme (SDP) to co-ordinate the
 delivery of price supports for farm-scale and communitybased renewables and to ensure the maximum delivery of
 the Teagasc MACC¹¹ climate roadmap.
- The "new REPS-2 Programme" in the Programme for Government Our Shared Future must be piloted in 2021.
- There must be increased support to farmers with designated land.
- There must be an increased allocation for the Organic Farming Scheme.
- The BDGP has been effective in improving the efficiency of the national suckler cow herd. This scheme must be simplified and built upon with an increase in the allocation for the scheme.
- There has been a bigger level of applications than anticipated in the recently introduced BEEP-S scheme.
 €35m was allocated under the scheme, an additional
 €17m is required to ensure all applicants are fully funded.
- The overall grant-aid available for the Low Emission Slurry Spreading (LESS) scheme must be increased to 60% and LESS equipment must be exempt from VAT.
- As per the commitment in the Programme for Government Our Shared Future, a liming programme to support farmers must be introduced, needing an allocation of €23m.

- Funding of €84m is required to expand and develop the Smart Farming Programme, as recommended in the Joint Oireachtas Climate Action Committee Report Climate Change: A Cross-Party Consensus for Action March 2019.
- The introduction of a protected urea incentive scheme, closing the price differential between it and existing products.
- A support must be put in place to encourage slurry additives uptake.
- A soil structure support programme to include soil aeration equipment to maximise the agronomic and environmental benefits of good soil structures.

1.4 Renewable Energy & the Bioeconomy

Most EU Member States have long recognised that political support is necessary to overcome the obstacles that limit the adoption of renewable technologies. However, the lack of clear and cohesive policy initiatives and financial supports to date will see Ireland fall considerably short of meeting its EU 2020 renewable energy targets and struggle to achieve the extremely ambitious 2030 targets outlined by the new EU Commission.

The Programme for Government *Our Shared Future* recognises the potential for microgeneration, solar, anaerobic digestion and other potential **farm scale renewables**. This must be backed up by substantial initiatives by the new Government to encourage farmers to participate in what it describes as a 'revolution in renewables'.

IFA proposes:

- Tiered supports are required for the development of anaerobic digesters, ranging from farm scale (up to 0.5MW), to community/small co-op scale (0.5MW – 2MW) and large co-op (5MW).
- The provision of a Capital Grant in the order of 50%-60% which is ring fenced from existing farm supports and essentially brings new capital to a farm solar proposition. There needs to be flexible criteria around this grant to ensure participation of all farmers regardless of the sector, size or geographic location. Supports need to be tailored to take account of the west/east and north/south divide for farmers, ensuring a level playing field regardless of farm size, farm location or farm sector.
- Development of a Feed in Tariff paid on the metered output of a solar installation and based on detailed financial modelling through the collection of funds from the carbon tax and the PSO¹² Levy.

¹¹ Marginal Abatement Cost Curve

¹² Public Service Obligation

- Favourable Tax treatment to promote uptake on renewable technology for farm communities.
 Revenue generated from renewable energy should be exempt from income tax for an extended period, as is the case with forestry¹³.
- Inter Community Network Charges Recognise
 the farming community as a virtual community in
 terms of auctions etc. Create a framework for energy
 communities that would allow small auto-producers
 to share their excess without incurring system
 charges, therefore increasing export value. This
 allows for energy trading between farmers.
- Finance Government need to provide access to low/ no interest finance to farmers and farm communities to encourage investment by the sector.
- RESS¹⁴ Amend and simplify the terms of RESS to allow a farmer grouping (community) to bid in and receive support as a combined community project.
- Engage with the farming community to ensure there are no prohibitive network charges to deter investment in small scale renewable energy projects.
- Planning exemption for farmers for small scale developments. One-stop advice clinics should be provided to assist project developers to submit successful applications.

1.5 Banking

COVID-19 Market Disruption Support / COVID Credit Guarantee Scheme

The agri-food sector which includes primary production is Ireland's largest indigenous sector and is a critical part of the food supply chain. Access to working capital is paramount for farmers across all the enterprises.

It is vitally important that farmers can access sufficient **low-cost funding** to cover their operating expenses during this unprecedented crisis. Increased reliance on merchant / cooperative credit is not an option as many of these businesses are struggling to collect monies owed.

The announcement of the COVID-19 Credit Guarantee Scheme is welcome, but it is essential that it contains the follow criteria.

IFA proposes:

- The Government through the SBCI¹⁵ must introduce a state backed guarantee (80%) low-cost interest (max 2.5%) loan scheme, which is accessible to all primary producers across all the farming sectors including aquaculture, forestry and amenity horticulture.
- The scheme must:
- Provide financial support to primary producers who are experiencing cashflow disruption and / or losing revenue due to the impact of COVID-19 virus.
- Operate through the main banks as heretofore with previous SBCI schemes, but also to include other financial institutions such as Credit Unions, An Post and other accredited asset lenders.
- Cater for loans up to €1,000,000 in the form of overdrafts, working capital and term loans in addition to asset finance.
- Offer a loan duration of up to 6 years in the case of term loans and asset finance.
- Provide for a 12-month moratorium on capital repayments.
- Ensure that the Government covers the interest payment for year 1.
- Not deny access to potential borrowers with insufficient security arising from reduced commodity prices and / or current asset valuations.
- Not use the family home as security.
- Not seek personal guarantees for loan amounts under €150,000.
- Not apply facility fees.
- Provide for a minimum loan value of €5000.

¹³ Section 232 of the Taxes Consolidation Act 1997

¹⁴ Renewable Electricity Support Scheme

¹⁵ Strategic Banking Corporation of Ireland

1.6 Farm Forestry

The forestry sector has a central role to play in Ireland's Climate Action Plan, which sets out an afforestation target of 8,000 hectares per annum. Despite this target, Ireland's afforestation programme has been in decline with an annual afforestation programme of approximately 4,000 hectares. As a result of policy decisions taken by the Government in recent years, farmers' confidence in forestry as a land use option has eroded.

Despite the huge potential of the sector, farmers are increasingly frustrated by the pace of progress to resolve **barriers to planting and mobilisation** within the sector. New measures are needed to reverse the decline in afforestation, while ensuring a balanced regional spread of forestry is achieved. Maximising the economic return from harvesting operations, particularly thinnings, is key to achieving afforestation and timber production targets.

IFA proposes:

- To restore the farmer premium differential as committed to in the Programme for Government Our Shared Future funding of €4m is required in 2021 based on the 8,000 ha planting programme.
- The introduction of a Harvesting Plan Grant to assist forest owners with the increased costs and requirements associated with applying for a felling licence.
- The introduction of an Ash Dieback Reconstitution scheme that appropriately compensates forest owners affected by the disease. This would include the reinstatement of 15-year premiums on re-established woodlands and an option not to replant under certain circumstances.
- The introduction of a Payment for Ecosystem Services (PES) in recognition of the range of environmental services provided by forests, including carbon. This payment would incentivise farmers to plant at the scale required and would provide income beyond the fifteenyear forest premium payments, as well as in subsequent crop rotations.
- The removal of restrictions on planting productive marginal land. In 2016, the COFORD¹⁶ Land Availability for Afforestation report identified 180,000 hectares of unenclosed land outside of environmental constraints that satisfies the eligibility criteria of the Afforestation and Woodland Creation scheme, which is currently excluded.
- The introduction of a Forest Owner Producer Organisation Scheme to provide supports for the preparation and implementation of Production and Marketing Plans for forest owner organisations.
- The development of a national Forest Certification scheme to overcome the obstacle to private forest owner certification that mirrors similar successful schemes operating in other European countries.

1.7 National Food Ombudsman

The commitment in the Programme for Government *Our Shared Future* to establish a National Food Ombudsman (NFO) is welcomed. This new authority must oversee the transposition of the EU Directive on Unfair Trading Practices¹⁷ (UTPs) in the food chain and go beyond the scope of the Directive to regulate the full food supply chain and include other UTPs such as unsustainable discounting, below-cost selling and annual tendering by retailers, so that farmers are not forced to take prices below the cost of production.

IFA proposes:

 The NFO must be adequately resourced and funded in order to effectively tackle the imbalance of power in the food supply chain so that it is fair, transparent, wellfunctioning and equitable.

1.8 Horticulture

The Scheme of Investment Aid for the Development of the Commercial Horticulture sector is critical to the expansion of the sector and has been successfully utilised in the past to undertake investment and improve efficiency and innovation.

IFA proposes:

- Funding for the scheme is increased to €10m in Budget 2021 to meet the demand for investment, evidenced by the oversubscription of the scheme in previous years.
- Compensation must be provided for the disposal of ash plants in the amenity horticulture sector, arising from the Ash-Dieback disease.

1.9 Animal Health

Irish farmers have a proven track record of raising the health status of the national herd through high levels of investment in disease eradication and control programmes and the application of the highest animal welfare practices.

This investment and commitment of farmers must be supported by Government directly and indirectly through the provision of the resources required to support farmers and the protection of our established good farm practice from unnecessary bureaucracy and controls.

Farmers are playing their part by proactively addressing Antimicrobial Resistance (AMR) at farm level. These efforts must be recognised by Government by providing the resources to implement any on-farm changes necessary and by reducing the cost of important preventative medicines such as vaccines.

¹⁶ Council for Forest Research and Development

¹⁷ Directive of the European Parliament and the Council, COM(2018)173, on unfair trading practices in business-to-business relationships in the food supply chain

IFA proposes:

- The Wildlife Control Programme must be resourced to proactively deal with all species of wildlife that are susceptible to TB and achieve eradication of TB within the shortest feasible timeframe.
- The Government apply 0% VAT rate on non-oral animal medicines and vaccines.
- Direct funding support to farmers to off-set the costs associated with implementing additional biosecurity measures on their farms.
- Investment in developing and providing pen-side testing and analytical tools to farmers and veterinary practitioners to facilitate implementation of best practice advice for veterinary medicine usage.
- Commence the 10-year renewal programme in the Regional Laboratory Network as per the commitment in the Programme for Government *Our Shared Future*.
- Appropriate veterinary staff numbers must be provided in all Regional Veterinary Offices.
- Direct financial support for farmers for the testing costs associated with completion of the BVD eradication programme.
- Continuation of funding levels in the Johnes control programme.
- Funding for a Department of Agriculture administered National IBR¹⁸ programme.
- Dedicated budget for the Early Warning System (EWS).

1.10 Aquaculture

1.10.1 COVID-19 Market Disruption

Irish aquaculture is experiencing a severe and unexpected impact due to the COVID-19 pandemic, with market closures and disturbances having an unprecedented level of disruption. In addition to redirecting available EMFF¹⁹ funds as financial aid for Irish fisheries and aquaculture, specific supports are required for Irish Aquaculture.

IFA proposes:

 Subsidised scheme for loss of sales/reduction in production - 40% subsidy / single farm payment for reduced 2020 production and sales based on a 3-year average of verifiable annual production figures, compared with reduced production figure for 2020. Compensation for stock lost due to mortality losses/ unsaleable stock as a result of over-stocked sites unable to sell due to lack of demand and no available markets.
 Unsaleable stock losses to be assessed similar to 40% subsidy/single farm payment.

1.10.2 Implementation of Aquaculture Licensing Review Recommendations

IFA welcomes the commitment in the Programme for Government of *Our Shared Future* to implement all the recommendations of the Independent Aquaculture Licensing Review. IFA has long sought a clear commitment from Government on an implementation plan that prioritises and gives clear timelines for each of the recommendations outlined in the review.

IFA proposes:

- Adequate and appropriate resources must be allocated to fully implementing all the recommendations of the Independent Aquaculture Licensing Review.
- Sufficient funding must be provided to ensure the earliest possible implementation of Recommendation 8.2; pre-application process and Recommendation 8.5; the establishment of a web-based Aquaculture Application and Monitoring System.

1.10.3 Blue Carbon Potential

IFA welcomes the recognition in Programme for Government *Our Shared Future* for the enormous 'blue carbon' potential that the ocean has to offer in tackling climate change, but appreciates that further scientific research is needed to understand and develop this potential.

IFA proposes:

 Sufficient funding and resources must be allocated to the Marine Institute to facilitate this scientific research. Consideration must be given to the role of the aquaculture industry as a carbon efficient source of sustainable protein and its contribution to marine ecosystem services.

1.11 Social Protection

1.11.1 Farm Assist

IFA welcomes the commitment in the Programme for Government *Our Shared Future* to review the means test disregards for Farm Assist. It is a vitally important scheme for low income farm families, allowing them to continue in production during difficult times.

¹⁸ Infectious Bovine Rhinotracheitis

¹⁹ European Maritime and Fisheries Fund

IFA proposes:

- The income disregard is increased from the current level of 30% to 50%.
- In the means test for Farm Assist, the depreciation rate for farm equipment and machinery should be increased to a standard rate of 10% to more accurately reflect the useful life of these assets.
- The income disregards for agri-environmental schemes, included in the means test for Farm Assist, must be extended to also disregard forestry premium payments.
- The option of a three-year income test assessment be considered.

1.11.2 Fair Deal and Support for Older People

Older farmers and other older people living in rural Ireland can experience poverty and social isolation because they rely on small fixed incomes that are vulnerable to increases in the cost of living or unexpected expenses, such as medical care. The current burden of nursing home care on farm families is threatening the viability of the family farm.

Rural dwellers face higher costs of living than those in urban areas, particularly in expenditure on transport and the necessity to own a car. The needs of older people and low-income farm families need to be addressed. The Programme for Government references the Fair Deal Scheme saying it will provide assistance when staying at home will no longer be an option. IFA welcomes the commitment to enact legislation implementing the revised Nursing Homes Supports Capital Schemes arrangements for farmers and business owners.

IFA proposes:

- Nursing Home Support Scheme (Amendment) Bill 2019 must be reintroduced immediately, and provide for the inclusion of farm land leased to third parties, in line with other Government policy on inheritance under Agricultural Relief²⁰.
- Older people must be supported to live at home through increased funding for the Home Care Package Scheme so that the number of hours provided is increased.
- The Total Contribution Approach (TCA) for calculating Contributory State Pension payments must be implemented in line with National Pension Framework (2008) agreement, which provides for total contributions of 30 years to qualify for a maximum payment.
- Credits must be provided to farmers on Farm Assist prior to 2007, when they were ineligible to make PRSI contributions under the scheme.

1.12 Farm Safety

IFA is steadfast in its belief that **awareness and education programmes** focussed on prevention, through supporting farmers to change behaviour, are the best way to reduce farm accidents. IFA is currently rolling out its peer-to-peer farm safety programme, which supports farmers through education and training initiatives.

IFA proposes:

- The introduction of a Farm Safety Scheme, with increased funding for health and safety equipment under TAMS.
- A handbrake and PTO²¹ improvement scheme: to include a PTO scrappage scheme and a handbrake replacement scheme, to assist farmers in replacing malfunctioning equipment.
- An annual farm safety budget be allocated to the Farm Safety Partnership Advisory Committee to implement future farm safety action plans.

1.13 Road Development

The National Development Plan envisages that almost €6bn will be spent on national road schemes. This will lead to considerable upheaval for farm families impacted, as their farms are carved up to facilitate the development of the national road network.

During the recession, when national roads construction had ceased, the $\[mathbb{c}5,000\]$ /ac flexibility payment was removed, it currently stands at $\[mathbb{c}3,000\]$ /ac.

IFA proposes:

 Farmers impacted by national road developments under the new National Development Plan must receive a flexibility payment, reinstated to the value of €5,000/ac.

Taxation Measures

The taxation proposals are based on three pillars of Income Stability, Reliefs and Succession and the Environment.



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2. Taxation Measures to Support Growth & Restructuring

2.1 Farm Transfer, Succession and Partnerships

2.1.1 Rates of Stamp Duty

In Budget 2020, stamp duty was increased from 6% to 7.5% for commercial property, which included farms. Agriculture is a low margin, highly capital-intensive business, which requires investment in its primary asset, land. This increase will also have significant impact on young trained farmers given the introduction of State Aid limits to their reliefs.

IFA proposes:

 Agriculture must be removed from the commercial definition and revised in line with the residential stamp duty charge of 1%, up to €1m, and 2% thereafter.

2.1.2 Reliefs for Stamp Duty

Ireland has a high level of owner-occupancy of farms, and the sustainability and viability of the sector requires that the family farm can be transferred between generations with the minimum of administrative complexities, legal costs and tax exposure. Farm fragmentation is a key structural issue for Irish farming, adding to costs and decreasing efficiency. When farming separate parcels of land, it causes issues with time management, extra labour, as well as stock / machinery movement and monitoring. Agriculture is a low margin, highly capital-intensive business with the primary asset - land - requiring large amounts of investment. Reliefs recognise the high prices of agricultural land for a low margin.

IFA proposes:

- The rollover of consanguinity relief post 2020 remains vital for farm transfer and planning.
- The extension of consolidation relief post 2020 is critical to incentivise farmers to reduce the number of parcels of land in their farm or to decrease the distance between them, with the net result of making their farm businesses more efficient and profitable.
- Young Trained Farmers Relief must be retained.
 However, the age requirement of 35 years should be
 moved in line with the Department of Agriculture's
 Young-Trained Farmer age maximum of 40 years and
 Revenue's age eligibility condition of the tax credit for
 succession farm partnerships, which is also up to 40
 years.

 Reviews to Stamp Duty reliefs should be announced before Budget day in October. Adequate timing should be provided for in the year it is due for renewal, to support smooth transfer.

2.1.3 Ceiling for Young Trained Farmer Stamp Duty Relief

The Young Trained Farmer Stamp Duty Relief was capped in the Finance Bill of October 2018, where it was amalgamated with the Stock and Succession Partnership Reliefs, and a lifetime limit of €70,000 was applied, due to the reliefs falling under State Aid. The use of State Aid by a member state can be justified if it is in line with the objectives of CAP, and one of the nine pillars of CAP is for **generational renewal**. IFA believes that the ceiling is constraining young farmers in the development of their farm business plans and restricting the new generation from entering into the sector.

IFA proposes:

 Young Trained Farmer Stamp Duty Relief should be fully removed from State Aid or the ceiling be increased, to allow for greater land mobility, encourage land transfer and develop economically viable farm units.

2.1.4 Agricultural/Business Relief & Capital Acquisitions Tax (CAT) Values

90% Agricultural Relief from Capital Acquisitions Tax is a hugely important support for the intergenerational transfer of family farms. Its retention for active farmers was a very positive move, ensuring that transferred land is put into productive use.

IFA proposes:

- The retention of 90% Agricultural is critical to support the transfer of economically viable family farms. The Association also supports the commitment in the Programme for Government to increase the Category A threshold (parent and child) from the current rate of €335,000 to €500,000 in future budgets.
- Due to changing demographics and family structures, the Favourite Nephew or Niece Relief should be extended to a Favourite Successor Relief, allowing the farm to be gifted to someone who would be in a better position to continue farming the land. The movement from Category B/C threshold to Category A would allow for less of a tax liability, protecting the sustainability of the farm and promote land mobility.

2.1.5 Collaborative Farming Partnership

The grant of up to 50% of the cost of setting up collaborative arrangements on farms has been successful in encouraging the growth of young entrants into farming and the sustainability of family farms by the reduction of costs.

IFA proposes:

· The extension post 2021 of this essential grant, which is diminishing.

2.1.6 CGT²² Entrepreneur Relief

IFA recognises the introduction of CGT Entrepreneur Relief in recent budgets to encourage investment in businesses and to reward risk-taking and entrepreneurial behaviour. From 1st January 2017, a reduced CGT rate of 10% applies to the disposal in whole or in part of qualifying business assets up to an overall lifetime limit of €1m of chargeable gains.

IFA proposes:

- · If a landowner wishes to sell land to a long-term tenant, then the CGT Entrepreneur relief of 10% will apply to incentivise supporting the genuine farmer and giving the long-term tenant preferred status.
- The lifetime limit of €1m on the CGT Entrepreneur relief should be increased in Budget 2021. The enhancement of CGT Entrepreneur Relief is an important measure to encourage risk-taking and investment, and the subsequent disposal of business assets during an individual's lifetime.
- Agricultural land that is subject to CPO should not be categorised as 'development' land and will still qualify for CGT Entrepreneur relief.

2.1.7 Interaction of CGT Entrepreneur **Relief & CGT Retirement Relief**

CGT Retirement Relief for disposals outside of the immediate family (i.e. disposals other than to a child) on lifetime amounts up to €750,000 provide a valuable safety net to many small business owners, allowing them to provide for their retirement.

Under the current legislation, there is an interaction between the two reliefs, which are both subject to a lifetime limit. Where some or all of the CGT Entrepreneur Relief has been used up by an individual, the amount of CGT Retirement Relief that remains available to them will be significantly diminished, or, in some cases, fully used up.

IFA proposes:

• The interaction between the two CGT reliefs should be removed, and that the two reliefs should be standalone. An individual should be able to avail, in full, of the CGT Entrepreneur Relief and the CGT Retirement Relief over the course of their lifetime, subject to satisfying the qualifying conditions of each relief.

2.1.8 Agricultural Relief – Removal of Individual Qualifying Criteria

The retention of 90% Agricultural Relief for active farmers in Budget 2015 was a critically important move, allowing for the transfer of family farms of a scale sufficient to generate a livelihood for the next generation, without burdening the new farmer with a major tax bill at the outset of their farming career.

However, the qualifying criteria for Agricultural Relief – both the 80% asset test and the 'active farmer' requirement - are individual criteria. Where the spouse may not be intending to actively farm at the time of the farm transfer, or where their assets are such that they would not meet the 80% qualifying criteria, the farm is unlikely to be transferred into joint ownership. By missing the opportunity, at the time of intergenerational transfer, to transfer the farm into joint ownership, this may prevent the farm ever being transferred into both spouse's names, and, therefore, reduce female participation in agriculture.

If the asset is transferred into joint names initially, then there is likely to be a higher active participation by the two spouses in the running of the farm enterprise. To qualify for the Young Trained Farmer Stamp Duty Exemption, only one of the spouses must meet the qualifying criteria if land is transferred into joint ownership or jointly purchased by spouses. IFA believes that a similar exemption should be extended to the Agricultural Relief qualifying criteria.

IFA proposes:

 To encourage the transfer of a family farm into joint ownership at the time of inter-generational transfer, IFA believes that 90% Agricultural Relief should apply where the farm is transferred into joint names, and where the 80% asset test and the active farming requirement is satisfied by either of the spouses.

2.1.9 Forestry & CAT / Stamp Duty Reliefs

The promotion of farm forestry is key for Ireland to achieve its environmental goals in terms of climate change and the renewable energy targets. When farmers enter into forestry, it is a long-term commitment of land-use. Biodiversity is also key target for Ireland, with mixed farming being encouraged.

Land with forestry is currently defined as being agricultural

for Capital Acquisitions Tax (CAT) Agricultural Relief, providing that trees are being grown on over 50% of the land; if they cover a smaller amount of the land, the Relief cannot be applied unless the land is split into separate folios of forestry and agriculture.

Whilst with Stamp Duty, land with woodlands growing on a commercial basis does not qualify for reliefs and is subject to the 7.5% rate. Currently the differing definitions cause unnecessary complications and complexities and are a barrier to investing in, transferring or selling forestry.

IFA proposes:

- If any percentage of the farm is dedicated to farm forestry, it should be defined as agriculture land and the CAT Agricultural Relief applied to the whole farm.
- Farm forestry is treated in a similar manner in relation to the Consanguinity and Young Trained Farmers Stamp Duty Reliefs as it is with CAT Agricultural Relief, where it is defined as agricultural land.
- Where a non-farmer buys forestry, that the rate of stamp duty at normal commercial rates apply to the full value of land and timber. This is to ensure forestry remains primarily with persons who are genuine farmers.

2.1.10 Extending 10-year Ownership and **Usage Period for CGT Retirement Relief to Spouse for Lifetime Transfers**

The agri-taxation review 2014 report identified an anomaly in the taxation system whereby the transfer of the 10-year ownership and usage qualification between spouses in the context of retirement relief from CGT is only allowable where a farm transfer occurs on the death of one of the spouses. Where the farm is transferred into joint ownership while both parties are alive, the spouse who takes joint ownership at that stage must own and farm the asset for the next 10 years before they can qualify for CGT Retirement Relief. This is preventing farm transfer into joint ownership and is a disincentive to female participation in agriculture.

IFA proposes:

 Where a farmer has owned and used an asset for 10 years and the asset is transferred into joint names, the transferee spouse should inherit the same time ownership and usage status.

2.2 Income Volatility

Income volatility, resulting from product price, input cost fluctuations and weather events, is a constant feature of agricultural enterprises. However, the added impact and damage of COVID-19 causing massive disruption to trade has magnified this issue. The introduction of additional targeted measures is required to allow farmers to directly manage risks in their own enterprises.

2.2.1 Income Averaging 'Step-Out' flexibility

Income averaging for farmers is a recognition that income in the sector is volatile and that the annual tax liability can vary significantly. The step-out facility for exceptional years (once in a five-year period) allows farmers to pay their tax on the basis of actual income in that year, rather than the average income.

IFA proposes:

 A farmer should be allowed to 'step-out' of income averaging more than once in a five-year period, where they are not carrying an unpaid deferred tax amount from a previous 'step-out', providing a strong incentive to repay the deferred tax also. For example, if the farmer 'steps out' from income averaging in Year 1 and repays the deferred amount in Years 2 and 3, they should be eligible to 'step-out' again in Years 4 or 5 of a cycle.

2.2.2 Agricultural Rainy-Day Fund

Based on the Government's Rainy-Day Fund, which was developed to enhance the resilience of the Irish economy and public finances to withstand future economic and financial shocks, it is vital that a similar scheme is available to farmers operating across all sectors. This voluntary mechanism would be open to all farmers and would permit them to defer a percentage of their annual receipts. The deferred funds could subsequently be drawn down at any time within the next 5 years, subject to Income Tax at the time of draw down.

IFA proposes:

 The introduction of an agricultural Rainy-Day Fund, which allows all farmers to put aside a small percentage of their gross receipts, whether in their co-op, specially assigned bank account or State Farm Volatility Fund, which could be used by the NTMA²³. This will create a buffer and ensure the long-term sustainability of the sector, which is very volatile. This money is then available for draw down within the next 5 years, and the tax due would be paid on the year of withdrawal; similar to how companies are allowed to offset their losses to protect the viability of the business by carrying it back from a loss making year to a profit making year.

2.3 Removing Discrimination in the Tax System

2.3.1 Earned Income Tax Credit

The discrimination in the tax system between PAYE employees and the self-employed, which results in the self-employed entering the income tax system at a lower income, must be fully eliminated in Budget 2021 as it is not in the spirit of supporting entrepreneurship.

IFA proposes:

• The commitment in the Programme for Government Our Shared Future to increase the Earned Income Tax Credit to €1,650 for the self-employed, to match the PAYE credit must be implemented in full in Budget 2021. The gap of €150 from the current level of €1,500, must increase to

2.3.2 Universal Social Charge (USC) for the Self-Employed

A surcharge of 3% is applied to any self-employed income over €100,000, resulting in a total of 11% USC applied on any proceeds over €100,000.

IFA proposes:

• The discrimination of the application of the USC between PAYE and self-employed earners must be removed, aligning the self-employed with PAYE workers.

2.3.3 Vaccines and Herd Health Products

The threat of Antimicrobial Resistance (AMR) to global public health is recognised by the WHO²⁴ and nationally through Ireland's National Interdepartmental Action Plan for AMR, involving the Departments of Health and Agriculture, which set out key objectives to reduce the threat.

Vital tools for farmers to reduce the need for antibiotics on farms are the availability of cost-effective vaccines and preventative treatments as part of herd health programmes.

VAT on non-oral animal medicines, including vaccines, is applied at the standard rate 23%, while for oral animal medicines a zero-rate of VAT applies.

proposes:

• The Government apply 0% VAT rate on non-oral animal medicines and vaccines.

2.3.4 Tax Treatment of Payments Received for Use of Forestry Land by a Third Party

Compensation received for use of forestry lands from a third party (e.g. utility company) is deemed to be for a partial disposal of their land and therefore subject to Capital Gains Tax. In some cases, a portion of the payment received is in lieu of the forestry premia income and therefore should not be taxable.

IFA proposes:

· Payment for the loss of this income i.e. forestry premium, should not be subject to Income Tax or Capital Gains Tax.

2.4 Environment

2.4.1 Carbon Tax Exemption on Agri-**Diesel & Other Agri-Fuels**

The Programme for Government *Our Shared Future* proposes an increase in the Carbon Tax from the current level of €26/t to €100/t by 2030. This increase will have a negative impact on agricultural in Ireland, as it will increase costs at farm level and across the supply chain. This will result in a reduction in the profitability of Irish agriculture.

The issue is particularly acute inside the farm gate where there is no alternative to agri-diesel (Marked Gas Oil) for farmers or agricultural contractors.

IFA estimate that the tax on agri-diesel alone, based on the narrative in the Programme for Government Our Shared Future, will put a cost on farmers of €27.3m in 2021. The current rebate system will mitigate but this is cumbersome and it is not open to all farmers. The carbon tax undermines the competitiveness of the agricultural sector and the planned future increase will have a huge impact at farm level over the next ten years.

IFA proposes:

· As there is no viable alternative to using agri-diesel and other agri-fuels, the application of the carbon tax cannot incentivise behavioural change, therefore they should be exempted from the Carbon Tax.

2.4.2 CGT / CAT Reliefs – Solar Leases

The amendment of Section 34 in the 2017 Finance Act extended the definition of assets that can benefit from CGT Retirement Relief and CAT Agricultural Relief to include land that is leased on which solar panels have been installed. Under the Act land being disposed of still benefits provided the area of land on which solar panels are installed does not exceed 50% of the total area of land concerned. Unfortunately, ongoing ambiguity surrounding the legislation is deterring many farmers from considering entering into land leases for solar projects.

IFA proposes:

 That the legislation is amended to give greater clarity and avoid the uncertainty that is impeding solar panel projects on farms. The calculations used to determine the area of land on which solar panels are installed, should only include the footprint of the structures mounting solar panels, ancillary equipment and service roadways (i.e. areas not capable of being grazed) and should exclude any area capable of being grazed by agricultural livestock either under, around or in between panels, ancillary equipment and roadways.

2.4.3 Green Tax Credit

The Climate Action Plan 2019 sets the target of 70% of electricity generated from renewable sources by 2030 in Ireland. The Programme for Government *Our Shared Future* clearly reflects IFA's position that greater community participation must be at the centre of future renewable energy policy to provide sustainable development. Farmers have already begun to contribute to renewable energy generation, by diversifying and devoting the use of their farmland towards low-carbon opportunities and climate abatement.

IFA proposes:

- To ensure the advancement of farm scale renewable infrastructure, that:
 - a generation feed-in tariff must be introduced for farm-scale renewable energy production, in particular solar, wind and anaerobic digestion.
 - income received for the alternative use of farmland for renewable energy projects should receive an income tax exemption, if such income is used for the purposes of re-investment in the farm business.

2.4.4 Accelerated Capital Allowances for Emission Efficient Equipment

IFA believes that investment in emission efficient farm equipment should be incentivised, similar to the incentive applying under the SEAI²⁵ Accelerated Capital Allowance scheme for energy efficient equipment. Increased investment in emission efficient equipment should be encouraged as part of the comprehensive response of the Irish agriculture sector's contribution to meeting the United Nations 2030 climate change targets.

IFA proposes:

 Farm equipment, which contributes to increased emission efficiency, such as LESS or capital investment in developing bioeconomy supply chains, must qualify for accelerated capital allowances. This would be provided through an enhanced SEAI Accelerated Capital Allowance Scheme, or through a parallel scheme, which would operate under the same structures – i.e. 100% capital allowances for investment in equipment that is independently certified and listed by a qualifying authority.

2.4.5 Farm Safety Incentive and Employee Flat-Rate Expenses

The fatality rate in Irish agriculture is higher than in any other economic sector. Under the current flat rate review, IFA is seeking inclusion as a separate category for Personal Protective Equipment (PPE) to minimise risk on farms.

IFA proposes:

- Non-registered farmers may reclaim VAT on costs for purchasing and maintaining farm safety equipment to help maintain best safety standards, via the VAT 58 form.
- Agricultural workers be included as part of the current review of the flat-rate expenses, in line with similar employees in the sector, a rate of €651.70²⁶ is estimated.

2.4.6 Carbon Tax Relief

Carbon Dioxide (CO_2) enrichment is an essential part of the production process for protected crops grown in Ireland. The crops which benefit most from CO_2 enrichment are tomatoes, cucumbers and peppers. CO_2 enrichment of crops is achieved by extracting the exhaust gases from fuels used for heating the crops. This means much of the carbon released is recaptured and used by the growing crop.

IFA proposes:

 Glasshouse growers of food crops using CO₂ enrichment, should be granted a Carbon Tax relief / rebate.

2.4.7 Excise Duty on Fuel

The departure of the UK from the EU presents significant challenges to logistics in the agri-food sector.

IFA proposes:

• The current rates on fuel and diesel remain unchanged.

2.4.8 Sugar Sweetened Drinks Tax (SSDT) and Healthy Eating

IFA recognises the rationale for the SSDT incentive for the promotion of healthy eating. It applies at a rate of 30c per litre where drinks have more than 5g of sugar per 100ml, whilst 20c per litre is- taxed on drinks with between 5g and 8g of sugar per 100ml. Since its introduction on 1st May 2018, Revenue has reached $\[\le \] 24.5m$ and a total of $\[\le \] 35m$ is estimated for 2019, with $\[\le \] 3m$ collected to end of March 2019.

IFA proposes:

 The €35m revenue generated from the sugar tax on sweetened drinks, should be directed towards the promotion of the consumption of fresh and healthy Irish produce.

Notes			







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