

CAP Strategic Plan 2023-27

Public Consultation on Proposed Interventions

Discussion document presented to IFA CAP Project Team – 23/08/2021

1 - Definitions

DAFM CSP Proposals	IFA views
<p>Agricultural activity <i>As per current CAP</i></p>	
<p>Agricultural area <i>Arable land/permanent crops/permanent grassland</i> <i>Permanent grassland to now include rushes</i></p>	
<p>Eligible hectare <i>Ag area (predom) used for ag activity in year of claim; may include <30% features beneficial to envir/water/biodiv – likely to increase eligible Ha's by 55,000</i></p>	
<p>Young farmer <i><40 years in year of application</i></p>	
<p>Active farmer <i>Min level of activity and/or negative exclusion list</i></p>	<p>Mini sales/ha with diff rate for ANCs. Savings to BISS. Prohibit long term leases, encourage sales. (Dairy Cttee: >€5000, more details)</p>

2 - Conditionality (GAECs) – *was cross-compliance*

DAFM CSP Proposals	IFA views
No change/issue identified in GAEC 1, 3, 6, 7, 10.	All GAECs must be sensible and pragmatically implemented. Minimise impact on farm businesses.
GAEC 2 <i>Protection of wet/peatland; DAFM looking at definitions</i>	Must not undermine farming activity on peat/wetlands.
GAEC 4 <i>Buffer strips along water courses</i>	Minimise width, prioritise management over width increase. No fencing. Not a requirement for non-derogation farmers
GAEC 8 <i>Crop rotation</i>	Ire should be exempt from GAEC 8. Existing crop diversification scheme under greening has ample crop rotation. On mixed farms, permanent pasture should also be eligible under crop diversification to reduce the number of farms with smaller cropped areas exiting the sector.
GAEC9 <i>Mini share of agri area for non-productive areas. Mini 5% of area. List of features, subject to ongoing review.</i>	Requirement from Europe is on arable land only – should not be extended to all land if not a requirement

3 - Basic Income Support for Sustainability (BISS)

DAFM CSP Proposals	IFA views
Will be subject to convergence and capping (consultation questions)	Convergence: Disappointment at failure to hold 75%. Must be limited to minimum 85%
Eligibility: submit application each year; meet mini requirement to receive DP; be “active farmer”; hold 1 BISS entitlement/eligible ha claimed	Capping: Dairy Committee: farmers leasing out farms long term must sell entitlements. Tax relief on such sales.
Impact on BISS payments of capping, payment reductions, CRISS, convergence dealt with in modelling paper.	New redistributive system must not create more unviable farmers.

4 – Complementary Income Support for Young Farmers (CIS-YF)

DAFM CSP Proposals	IFA views
Eligible YF may apply on up to 50 ha	50 ha too high (?)
Eligibility: <40 y.o.; head of holding for first time or in 5 years preceding first application; Level 6 or equivalent ag course award; entitled to BISS.	
Requirement for funding for YF: 3% of DP to come from CIS-YF (2% of PI) and TAMS in PII (1%)	

5 - Eco-scheme

DAFM CSP Proposals	IFA views
Annual intervention – farmers can opt in or out annually. Application through BISS. Ag practices/actions under ES must > conditionality.	Can't impact farm incomes. Must be able to recoup funding deduction. More impacted farm businesses must get higher payments to maximise participation.
Opportunity for as many farmers as possible to take up most appropriate actions on their farms. Eligible if eligible for BISS.	Actions simple, no financial cost. No weather dependent action (e.g. catch crop planting) outside of farmers' control. Existing Greening measures could be included.
List of actions: climate mitigation/adaptation; water quality; prevention/restoration of soil degradation; biodiversity; reduced pesticide use; animal welfare and mitigation of antimicrobial resistance. Other actions also considered.	Recognition of actions already undertaken. Actions with broad appeal. Payment not based on income foregone/cost incurred. Payment additional to BISS.
Min 25% of PI budget – payment flat/ha will depend on uptake.	Rebate mechanism must be used to minimise funds allocated to eco-schemes

6 – Apiculture Programme

DAFM CSP Proposals	IFA views
Funding for institutions for research in Apiculture sector to be available under 5-year National Apiculture Programme.	
Research in bee diseases and pests or other causes of colony losses, incl pathogens and climate change.	
Recruitment of part time advisor to support beekeeping associations in Ireland.	
Co-operation with specialised bodies in the field.	
Total indicative financial allocation 2023-27 = €616,400.	

7 – Sectoral Intervention in the Fruit and Vegetable Sector

DAFM CSP Proposals	IFA views
Support for POs new or existing.	
POs must submit 5-7 yr Operational Programme. Must include survey of farms incl. details of environmental measures in place, to be updated annually.	
Eligibility for recognition: PO must produce F or V (excl. potatoes) with marketed value >€2.5m; >5 members; fulfil all EU legal requirements for recognition as PO.	
Aid budget = 4.1% of each PO's Value of Marketed Product. 50% of Op Programme costs may be covered. >15% of aid to be spent on environment objectives; 2% on R&D. Annual indicative financial allocation = €7.8m (€39m for 2023-27).	Max spend on environmental measures must be <15%.

8 – Coupled Income Support for Protein Aid

DAFM CSP Proposals	IFA view
Scheme to support domestic production of protein crops in Ireland by direct support to the farmers growing them.	Comprehensive Tillage Scheme required, with greater ambition. Previous protein crop scheme poorly taken up.
Eligibility: farmers submitting BISS application each year, declaring area of eligible crops.	Double budget from €3m in last CAP to €6m.
Crops: peas, beans, lupins. Under consideration: soya, mixed cropping (protein/cereal mix)	
Funding available depends on decisions relating to capping, convergence, eco-scheme etc.	

9 – Complementary Redistributive Support for Sustainability (CRISS)

DAFM CSP Proposals	IFA views
Measure is now mandatory, and objective is to redistribute payment from larger to smaller/medium size farms.	Must not contribute to creating more unviable farmers.
Funded from PI budget deduction (10%) for redistribution on first hectares of all eligible farmers. Derogation allows other redistribution to be taken into account in deciding level of CRISS deduction.	
Eligibility: BISS application; Meet mini requirements to receive DP; be an active farmer.	
10% = approx. €118m/yr or €590m for 2023-27 Equates to €44/ha on first 30 ha if 10% CRISS applied	
Impact of this measure and other capping/reductions in modelling paper.	

Pillar II Interventions

General IFA views

Pillar II funding must support the more vulnerable sectors (beef, sheep, tillage)

Maximise national co-financing of PII schemes – current proposals suggest an increased level

Programme for Govt commitment to maximise PII co-financing in new CAP must be delivered

Carbon Tax receipts to deliver agri-environmental scheme cannot be raided to deliver co-financing

Current nationally funded schemes must continue and remain separate from co-financed schemes

No leakage from scheme: direct return to farmers must be maximised

All costs associated with scheme must be funded by national exchequer outside CAP funding

Payments must be based on incentive + support on top of cost incurred/income foregone.

Tillage farmers disadvantaged by Greening + Ecological Focus Areas in last CAP. Convergence and eco-schemes will affect them this time. Need an ambitious PII Tillage Scheme.

Dairy Cttee proposal: Financial support for retiring/exiting farmers to encourage land mobility.

1 – Agri-Environment Climate Measure

DAFM CSP Proposals	IFA views
Similar to previous AEC measures. Prescription-based at fixed rate of payment + result based measures. General scheme (individual applicant, was Menu A).	Must have broad appeal. Prescription-based front loaded and pay >€10,000 + results based payment.
Landscape approach (co-operation project, was Menu B) – farmers in areas marked for higher environmental priority will participate in specific co-operation actions with possible higher payments. Local Project Team.	Prescription-based: large list of options; recognise existing features; continue earlier schemes. Results-based: suitable for all sectors; large list of options; simple scoring
Dedicated action for land re-wetting, tree planting, incl riparian and agroforestry. Climate, water quality and biodiversity.	Landscape approach must not be forced on farmers. LPT funding must not be from CAP. Organic farmers must not be excluded from other AE schemes.
Eligibility: open to all farmers. DAFM defining areas with higher envir. priority to receive higher payments.	Dairy Cttee proposal: High N and P catchments to be considered as higher envir. Priority areas.
50,000 farmers expected to take up this measure.	
No budget indicated (€xm)	

2 – Agri-Environment Climate Training

DAFM CSP Proposals	IFA views
2 courses for participants in AECM. 1 st course mandatory in 1 st year. 2 nd course voluntary, in 3 rd year.	
1 st course: Green Architecture model; environmental and climate challenges; health and safety; info on individual commitments.	
2 nd course: management and aftercare.	
Eligibility: Farmers who participate in AECM; Providers of training: registered with FAS, Level 8 qualification, have received specific DAFM training for AEC scheme.	
No budget indicated yet. Will depend on cost of delivery and material.	

3 – Organic Farming Scheme

DAFM CSP Proposals	IFA views
5-yr scheme to support farmers converting to organic and existing organic farmers. Aim to support Programme for Govt target of 7.5% of UAA to be farmed organically.	Scheme must pay €520/ha for conversion farmers, €470/ha for flat rate.
Same as existing scheme	Don't exclude OF from other agri-envi schemes; lift investment grant rate to 60% for conversion farmers.
Eligibility: Farm area >3ha, hort (incl fruit): >1ha. Registration with Organic Control Body, valid organic licence, registration with DAFM; completion of level 5 course in organic farming.	Non-CAP support needed to grow market demand – as per Food Vision 2030 - and protect market premiums to fairly remunerate farmers.
Rate of payment will vary across farming sector. Higher payments during 2-year conversion period. Higher rates for hort (incl fruit), tillage and dairy.	Open to all farmers regardless of sector to achieve national objective. Reduce mini stocking rate to ensure hill farmers are not excluded.
No budget indicated yet.	<p style="text-align: right;">Pillar II</p>

4 – Areas Facing Natural Constraints (ANC)

DAFM CSP Proposals	IFA views
<p>3 Mainland Land Categories + 1 Off-Shore Island category.</p> <p>Cat1: extensive livestock on higher ground; Cat2: extensive livestock on lower ground; Cat3: less extensive grazing livestock; OS Island: fragmented, small, economically marginal.</p>	
<p>Eligibility: Active farmer, >3ha forage and arable land in designated area; Mini stocking level 0.15LU/ha (lower if environmentally justified).</p>	
<p>Variable payment per category, as yet unspecified, front loaded and subject to overall max number of ha.</p>	
<p>No budget allocation specified yet.</p>	

5 – Producer Organisations in the Beef and Sheep Sectors

DAFM CSP Proposals	IFA views
<p>This scheme is to support the setting up of POs for sheep and beef sectors to improve their position in the value chain.</p>	
<p>Financial support over 3 years: year 1 advisory + admin costs; years 2 and 3: admin costs only.</p>	
<p>Eligibility: Must be set up at initiative of and be led by producers; >20 members; constituted in line with EU CMO regulations; registered with Companies Office.</p>	
<p>Target (unspecified) for number of new groups to be established in the first 3 years.</p>	
<p>No budget allocation specified.</p>	

6 – Suckler Carbon Efficiency Programme

DAFM CSP Proposals	IFA views
5-year contract, A – for farmers in BDGP on 01/06/21; B – for farmers not in BDGP before, or on 01/06/21.	Must deliver €300/suckler cow support.
4 mandatory actions for both: Replacement strategy; Genotyping; Weighing; Data recording. 2 complementary voluntary actions: Forage quality, Faecal egg testing. ½ day livestock handling course.	Increase/update costings, add practical beneficial measures. Annual scheme with no retrospective penalties already received.
If also participating in Dairy Beef Welfare Scheme, can only claim payment under 1 scheme.	
Eligibility: BISS; Beef breed animals born annually; member of Bord Bia BLQAS; Reference year TBC;	
Participant won't be able to increase cow numbers during contract, though some flexibility. If reducing cow numbers this becomes new reference number	Ref period must reflect most recent stock nos. No restriction to cow number increases. No penalty for progress achieved. Recognise costs of maintaining herd status.
No payment level/budget allocation indicated yet.	

7 – Dairy Beef Welfare Scheme

DAFM CSP Proposals	IFA views
<p>Young Calf (farmers breeding only dairy herds) and Growing Stage (farmers who own and breed dairy beef calves). Farmers in YC or GS must complete 2 actions, one from category A and one from B. They may pick two actions from each category.</p>	<p>(Livestock Committee) As structured does not contribute to supporting vulnerable sectors. Scheme must include suckler bred calves/cattle and support farmers who rear calves, weanlings, stores and finish cattle.</p>
<p>YC-A: Sexed Semen or Genotyping YC-B: High DBI or Beef Stock Bull GS-A: Weighing <1y.o. or Weighing DB Animals <2 y.o. GS-B: Parasite Control or Forage Quality</p>	<p>(Dairy Committee) Include grass measurement as action under GS.</p>
<p>2-hour training course annually. Half day livestock handling course at end of year 1.</p>	
<p>Eligibility: BISS; beef breed calves born on farm annually for YC measure; be member of BLQAS/SDAS.</p>	
<p>No payment level/budget allocation indicated yet.</p>	<p>Pillar II</p>

8 – Sheep Improvement Scheme

DAFM CSP Proposals	IFA Views
Lowland Flock and Hill Flock owners must take 2 actions, one from Cat A and one from Cat B	Sheep sector is vulnerable. Scheme must deliver €30/ewe support.
LF-A: Lameness; Mineral Supplementation Ewes; or Parasite Control LF-B: Genotyped Ram; Scanning + Recording results; or Flystrike Control HF-A: Mineral Supp Ewes; Meal Feeding Lambs; or Parasite Control HF-B: Genotyped Ram; Scanning + Recording; or Mineral Supp Lambs.	Increase/update costings and amend with additional practical/beneficial measures for sheep farmers. Shearing must be included. It is uneconomical, but critical for health/welfare/parasite control. Wool is a natural sustainable product which can be part of the circular economy.
Eligibility: Flock No, breeding ewes on 2022 Census; Ref period; Payment based on < of ref no or latest census; Complete census each yr; Member of SBLAS .	Ref period must reflect actual level of activity. New entrants must be given time to establish flocks for ref numbers.
Payment will be based on cost incurred minus economic benefit of action. No budget allocated yet.	Pillar II

9 – European Innovation Partnership (EIP-AGRI) Operational Groups

DAFM CSP Proposals	IFA views
Stream A projects – competitiveness, modernisation, animal health and welfare; Stream B projects – environmental, biodiversity, climate change.	
DAFM plans to look for proposals around uptake of digital tools/tech on farms, rearing of pigs with intact tails, bioeconomy development at farm level.	
Phase 1 – Initial call for proposals evaluated by expert committee; Phase 2 – Successful applicant develop proposal and submit Operational Group Plan for evaluation; Phase 3 – Successful applicants move to implementation. Costs of development in Phase 2 and implementation in 3 covered.	
No budget identified yet. Phase 2 supports <€10,000; full costs of implementation of OGP after Phase 3.	

10 – On Farm Capital Investment Scheme (was TAMS)

DAFM CSP Proposals	IFA views
Similar implementation to TAMS II, rolling tranche based system.	
Investment provided for: Environmental Investments; Animal Welfare; Nutrient Storage; Tillage Farmers; Young Farmers; Organics; Farm Safety.	Increase organic rate to 60% for conversion farmers. Reinststate the Dairy Investment Scheme. Up rate of grant for LESS to 60%.
Eligibility: active farmer >18y.o.; herd no/tillage identifier; Mini 5ha declared under BISS (1ha for hort); comply with planning permission and tax clearance. Young farmers <40y.o. must be head of holding and have appropriate training or skills.	Provide grants for nutrient storage equipment, including for farmers with insufficient slurry storage.
No budgetary allocation yet as scheme is demand led. Payment rate will vary depending on projects and whether applicant is YF. Current ceiling levels to be retained. Separate ceiling for LESS.	

11 – Continuous Professional Development (CPD) for Advisors

DAFM CSP Proposals	IFA views
Scheme to upskill advisors re. all issues identified in DAFM’s SWOT analysis and Needs Assessment. This follows from and builds on previous RDP scheme.	
Tendering process to select suitably qualified training providers in climate change, mitigation and adaptation; sustainable energy; air, soil and water quality; biodiversity conservation; adoption of new tech and best practice.	
Eligible providers to be selected through issue-based tender process based on identified training themes.	
Tender process will also determine support rates, with focus on high quality, track record and value for money. No budget allocation identified yet.	

12 – Knowledge Transfer Programme

DAFM CSP Proposals	IFA views
KT Groups to be set up across all farming sectors, based on local needs, not farm enterprise.	Organic farming must be catered for.
4 meetings/year on Priority KT Topics (from list to be decided and refreshed annually); 4 meetings/year on topics decided by the Group.	Increase from 5 to 8 meetings/year means more time and travel costs that must be offset in payment. Blend of local and national meetings must continue.
At least 1 Priority KT Topics meeting must involve external expert.	Remote online meeting option must be explored.
Each KT facilitator must hold 1to1 meeting with each farmer in group @ beginning, middle and end of 4-year programme to set out goals and report progress.	
Eligibility: KT Facilitators -> level 8 qualification; FAS approved.	
KT facilitators receive payment/farmer who completes each year; farmers receive payment each year on completion. No budget allocation identified yet.	Payment must be made to farmer, who will then pay facilitator.

13 – LEADER Programme

DAFM CSP Proposals	IFA views
<p>Objectives: support private enterprise and communities to improve quality of life and econ activity in rural areas; create/sustain jobs in rural Ireland; social inclusion + climate change mitigation.</p>	
<p>Support to Local Action Groups to implement Local Development Strategies.</p>	
<p>Indicative high level LEADER themes: Economic development + job creation; Rural infrastructure + social inclusion; Sustainable Development of RD and Climate Change Mitigation.</p>	
<p>2-phase process – expression of interest; development phase. LDS selected by Indept Selection Cttee. Indiv projects eligible if achieve aims of LDS.</p>	
<p>Support rates vary, co-financing required by public/private investors. No budget identified yet.</p>	<p>Pillar II</p>

Key Questions to be addressed (1/2)

(note, these relate to Direct Payments only)

DAFM Questions	IFA Response
<p>a. Should Ireland implement capping at an effective rate of €66,000 or €100,000 or at a rate in between?</p>	
<p>b. Should internal convergence stop at 85% of the national average payment entitlement value in 2026, or should it go to a higher percentage?</p>	<p>Disappointed at failure of Minister/EU Council to hold at 75%. Convergence should be minimised at 85% to avoid making more farmers unviable</p>
<p>c. Should Ireland go beyond the 10% of direct payments to redistribute from larger to smaller or medium-size holdings? Or should Ireland seek to use the derogation to reduce the percentage? Should this funding be redistributed to farmers with holdings of less than 30 hectares?</p>	<p>Avoid making more farmers unviable.</p>

Key Questions to be addressed (2/2)

(note, these relate to Direct Payments only)

DAFM Questions	IFA Response
<p>d. Should Ireland go beyond the 25% of direct payments to be allocated to eco-schemes? Or should Ireland use the flexibility in the regulation to reduce the percentage allocated to eco-schemes?</p>	<p>Eco-schemes cannot negatively impact farm incomes. Minimise deduction using Council rebate approach Ensure farmers who participate in schemes have capacity to recoup what is being deducted from them</p>
<p>e. What aspects of the current system do you consider unfair, and what is the best combination of all of the above mechanisms in order to bring about a fairer distribution of direct payments?</p>	
<p>f. Should there be specific interventions to incentivise gender equality?</p>	

Thank you for your attention!