



IFA

Manifesto for European Parliament and Local Government Elections 2024

Irish Farmers' Association, April 2024



European Parliament Elections - Key Asks

CAP - CAP funding must be **increased** and used to support farmers, food production and food security. The global demand for grain, meat and dairy is increasing. If these are not produced in Ireland they will be produced elsewhere with higher (negative) environmental impact. **A separate EU environment fund** in addition to the CAP, must be created to support environmental action on farms. This must include support for farmers with **designated land** and any actions that may arise if the **EU Nature Restoration Law** is passed. Future generations will not commit to farming without more **certainty** on funding streams.

OVER REGULATION - Over regulation is causing frustration and anger amongst farmers. It is resulting in significant **extra costs** at farm level. Potential successors and new entrants are being turned away by the **constant escalation in regulations**. The EU Parliament must focus on reducing poorly thought-out regulations, including CAP conditionality such as GAEC 2 on peatlands. There must be **proper engagement** with farmers to ensure that policy is fair and **implementable at farm level**, including the Government's proposed land use policy.

RETAIN THE NITRATES DEROGATION - Irish MEPs must be part of a national effort to **retain the current nitrates derogation**. Ireland has a **unique grass-based system** and there must be recognition for this from the EU. **Over 30 measures** have been introduced at farm level since 2020. These must be given time to work. **One EU size does not fit all**. Farmers need a period of **certainty** to justify making ongoing environmental investments on their farms.

ENVIRONMENTAL FAIRNESS - Farmers must be **recognised for the environmental actions** they are already taking. There must be a **fair measurement of emissions** that recognises that methane is a short-lived gas. Farmers must get **credit for carbon which they are sequestering on their farms** (See Appendix - IFA's Thomand Park Declaration). There must be a level playing field on trade. The EU market cannot be undermined by imports produced to lower standards. The Mercosur trade deal must be stopped.

Local Authority Elections - Key Asks

PLANNING - a much **more efficient planning process** is required. Planning objections should not be allowed from outside the local area. Flooding works must be fast-tracked. **Development levies** are punitive in some counties and should be suspended for rural dwellings (new and extensions to existing) and on-farm environmental investments.

LAND TAX - actively farmed land must be exempt from the **Residential Zoned Land Tax (RZLT)**. It is penal, unjust and disproportionate. Farmers challenging the RZLT maps and/or applying to Local Authorities to have their land dezoned must be accommodated without being disadvantaged.

ASH DIEBACK - an urgent **Roadside Ash Dieback scheme** is needed to safely remove diseased trees. It is a costly and dangerous operation. Farmers need support to provide traffic management during felling, and financial support to engage suitably qualified professionals to safely fell the trees.

CONNECTIVITY - more investment in **roads, broadband and phone coverage** is required. We need real investment in these essential services to keep people in rural areas and encourage new people into rural Ireland.

ENVIRONMENTAL INSPECTIONS - Local Authorities intend to carry out over 4,500 environmental inspections on farms by 2025. Each Local Authority needs to agree a Protocol for farm inspections with the IFA.



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IFA European Parliament Election Candidate Meetings

IFA President, Francie Gorman, is urging farmers to attend these meetings as it will offer an opportunity to ask candidates about their position on key farming issues.

South Constituency

- Tuesday April 30th: Cork Marts, Corrin, Fermoy, Co. Cork, P61 EE37
- Tuesday May 7th: Gowran Park Racecourse, Gowran, Co. Kilkenny, R95 AH5W

Midlands-North-West Constituency

- Thursday May 2nd: McWilliam Park Hotel, Claremorris, Co. Mayo, F12 D1W3
- Wednesday May 8th: Bloomfield House Hotel, Mullingar, Co. Westmeath, N91 HP8E

All meetings start at 8pm

For further information please contact:
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SECTION 1:

A message from the President

Irish and European farmers' roles and contributions are undervalued despite their significant impact. They not only support economic activity and employment in rural regions but also provide high-quality food to 450 million EU consumers at an affordable price.

Farmers require continued financial support and practical agricultural and environmental policies to sustain these standards and ensure food security for EU citizens. However, the current situation is dire, with nearly 1,000 EU farmers halting operations daily due to financial challenges. Here in Ireland, the figure is close to 1,400 per year. Many Irish farms earn less than €20,000 per year, exacerbating issues of intergenerational renewal.

The Common Agricultural Policy (CAP) is intended to support European food production, but its budget falls far short of meeting current ambitions. Additionally, increased demands

for sustainable production methods incur additional costs not reimbursed by the market, making it difficult for farmers to comply.

CAP must refocus on its core objectives, with a considerable budget increase to match demographic challenges and account for inflation. Moreover, a separate EU environment fund is needed to support environmental action on farms, ensuring future generations commit to farming with certainty on funding streams. This must include support for farmers with designated land and any actions that may arise if the EU Nature Restoration Law is passed.



While environmental sustainability is crucial, CAP alone cannot deliver it.

Farmers are committed to meeting our climate, water, and biodiversity challenges and have invested billions. Still, we need to get real on what can be achieved at farm level and how quickly it can be achieved. Herein, maintenance of the Nitrates Derogation at a minimum of 220kgN/ha, for example, is imperative.

There needs to be a move beyond four-year reviews to better assess the impact of on-farm interventions and provide greater certainty for farmers. The two-year interim review process is currently designed to fail.

The burden of economic constraints and bureaucracy is stifling farmers across Ireland, compounded by the threat of further reductionist EU policies spanning the Nature Restoration Law (which our Irish MEPs kept alive), Industrial Emissions Directive, Water Quality Framework, etc – on existing and future farm operations. Our elected representatives must acknowledge that, individually, the impact of these policies is damaging to the economic viability of farms (most notably the small-scale or designated farms). Still, collectively, they are disproportionate and will intensify the exodus trend witnessed in recent years. Enough is enough.



Farmers require stability and predictability for the years ahead, with new EU strategies and legislative projects based on science and high-quality impact assessments at the Member State level. Stakeholders affected by the decisions must be consulted and adequately compensated for their endeavour and any lost income and asset value arising. False promises were made to farmers operating in designated areas regarding the latter. This must be rectified in the first instance, and the same mistake must be avoided at all costs. These designated farms cannot also disproportionately carry the burden of policy compliance. No further restrictions can apply to these holdings. Many are already at breaking point.

Farmers deserve acknowledgement for their positive environmental, biodiversity, and societal contributions. MEPs must ensure robust carbon trading mechanisms are in place to support farm incomes. At the same time, trade must maintain a level playing field to prevent imports from being produced to lower standards. The Mercosur Trade deal must be stopped.

The European Commission has acknowledged the challenges faced by farmers and committed to simplification.

However, the simplification package proposed will do little for Ireland unless concessions on GAEC-2 are included. Going forward, actions must match words, with genuine strategic dialogue required for various measures to avoid disadvantaging farm operations.

The Commission's withdrawal of the Sustainable Use of Plant Protection Products (SUR) proposal is an essential first step.

However, similar and genuine strategic dialogue is required for other measures, including the Nature Restoration Law, Nitrates Directive, and Industrial Emissions Directive, so as not to disadvantage the economic viability of farm operations unduly.

With only months to pivotal elections for the future of Europe, Irish and European farmers will be expecting a swift and positive reaction from the European Executive to be able to continue their activities in acceptable conditions, with decent incomes and fewer administrative burdens.

EU and Irish agriculture and its small-scale diverse family farm model deserve to be recognised as fundamentally important and a strategically important asset to Europe's social, cultural, economic and environmental fabric, particularly in rural areas. We are the custodians of the land and need our MEPs to stand firm, support, protect and promote on our behalf.

A positive communication campaign about the vital role of farming and the need for a strong CAP is much needed when the image of agriculture in the media is often rather negative and disconnected from the legislative framework and obligations farmers must comply with. All the positive externalities agriculture brings to food security, the survival and vitality of all other sectors of the economy, rural communities, and development, as well as the environment and social sphere, are certainly not highlighted as much.



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CONNECTIVITY - more investment in **roads, broadband and phone coverage** is required. We need real investment in these essential services to keep people in rural areas and encourage new people into rural Ireland.

ENVIRONMENTAL INSPECTIONS - Local Authorities intend to carry out over 4,500 environmental inspections on farms by 2025. Each Local Authority needs to agree a Protocol for farm inspections with the IFA.

To conclude, Irish farmers want to continue to produce food to the highest standard using our primarily grass-based system. We want to continue to be at the heart of our rural communities, providing jobs and economic opportunities. However, we need to be fairly compensated for this and provided the ability to plan for the current and future generations.

This Manifesto identifies the issues IFA members will raise with the political parties and candidates before the European and Local Elections. Rural areas are home to 137 million people, or 30% of the EU population. Farmers and their families will decide on polling day based on the responses they get from candidates and the political parties.

Francie Gorman
IFA President

SECTION 2:

IFA in Brussels

IFA has a permanent office in Brussels headed up by our European Affairs Director Liam MacHale. IFA represents all farming sectors at National, European and International level. From the start, IFA campaigned hard to secure the full benefits of European membership for Irish farmers. Through our office in Brussels, established in 1973, the IFA represents Irish farmers on the European umbrella body, COPA. In addition, the IFA is the representative for Irish farmers on the World Farmers' Organisation.

All Chairmen of IFA's National Committees and Sections are involved in representing Irish farmers in Europe, led by our President and Director General. IFA's democratic structure, representing farmers in all commodities and all regions, means that IFA is recognised by the EU as the voice of Irish farmers in Brussels.

IFA is represented on over 40 policy and market analysis working groups / committees at EU (Table 1) and International level, including:

- EU Commission's Civil Dialogue Groups - these involve high-level meetings directly with the relevant Commission DGs, including Agriculture and Rural Development, Sante, Trade, Environment etc. on various issues including CAP, Trade, UTPs, Rural Development, Areas of Natural Constraint, Aquaculture and the Environment. These committees are made up of key EU Commission officials and representatives of consumers, agri-business, environmental, animal welfare / wildlife and social groups, as well as farmers.
- Parliament - IFA is also engaged in direct lobbying of all thirteen Irish MEPs and the Agriculture Committee of the European Parliament in Brussels and Strasbourg. The Parliament and the Council of Ministers are co-legislators for agriculture.
- Council - IFA maintain a watching brief at Agriculture Council of Ministers meetings when EU Farm Ministers meet with the Commissioner on policy and market issues.

- COPA - the European Farmers' Organisation - the IFA President and Director General sit on the powerful COPA Praesidium, which meets on a monthly basis to discuss and decide European farmers' strategy and policy. Outgoing IFA President, Tim Cullinan, is currently the elected COPA Vice-President.
- IFA National Committee Chairs and staff are members of a wide range of COPA Working Parties on all the commodity and policy areas in which Irish farmers have an interest.

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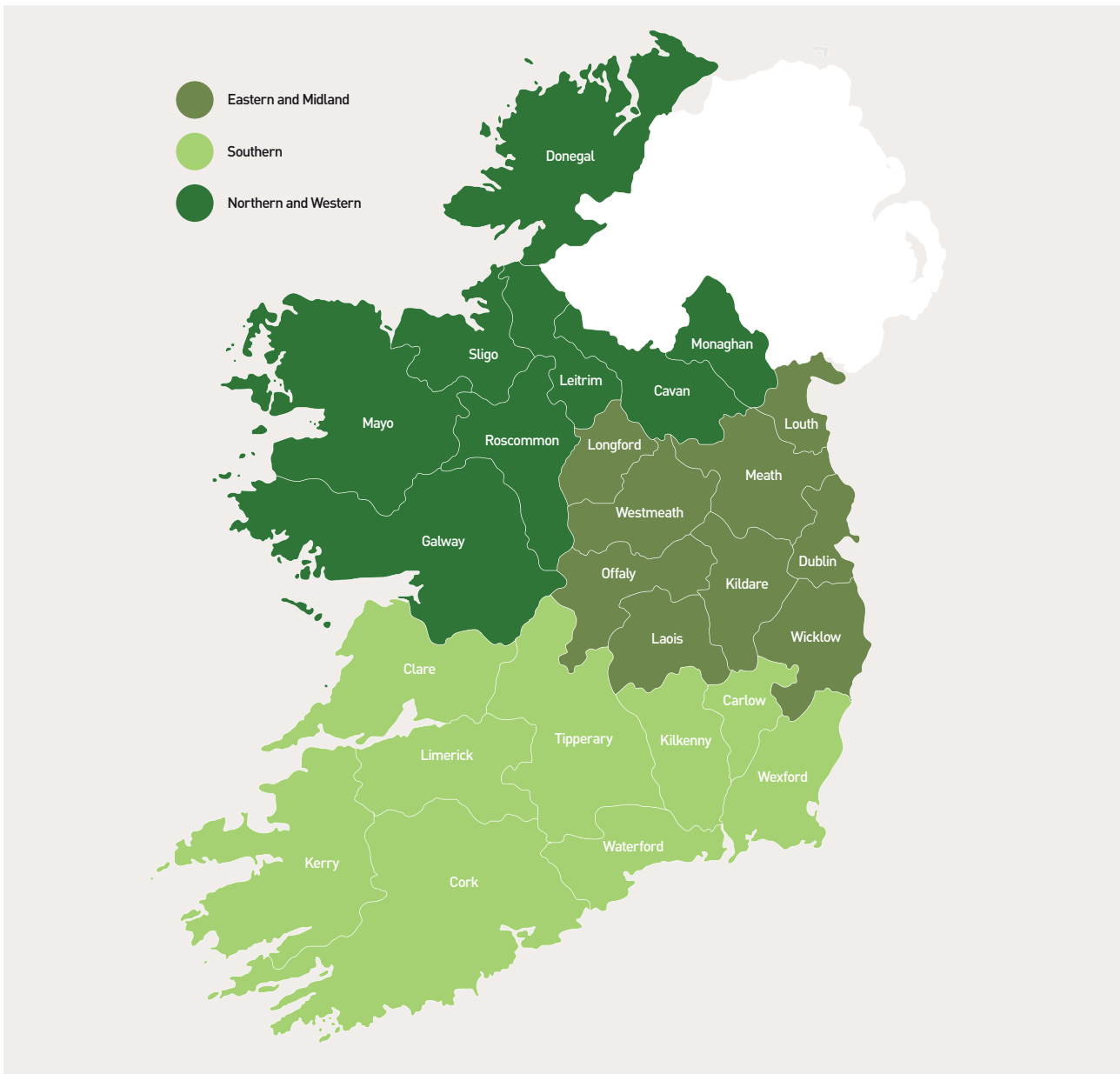
IFA in Brussels Committee List

Table 1: COPA Working Parties and EU Civil Dialogues

COPA Working Parties:
Praesidium
POCC: Farm Organisations' Monthly Meeting
Beef
Cereals
Eggs and Poultry
Feed stuffs
Food Chain
Forestry
Fruit and Vegetables
Fish
Horses
Milk
Organic Agriculture
Pigmeat
Potatoes
Rural Development
Sheep
Taxation and Legal Issues
Animal Health and Welfare
Women's Committee
Federation of European Aquaculture Producers
European Mollusc Producers' Association
European Nurserystock Association
GEPC (Mushrooms)
CAP
CAP Rural Development
CAP Direct Payments and Greening
Bioenergy – Biotechnology
Risk Management and Insurance
Research and Innovation
Communications

TASK FORCE on:
Bioeconomy
Fertilisers
Agricultural Technology
Carbon Border Adjustment Mechanism
Sustainable Finance (Taxonomy)
Pact for Skills (GEOPA)
Fit for 55
Bees and Agricultural Practices
Biodiversity / Soil
Large Carnivores

EU Civil Dialogues:
CAP Strategic Plans and Horizontal Matters
CAP Direct Payments and Greening
Cereals/Oilseeds & Proteins
Milk and Dairy
Beef and Veal
Pig meat
Sheep/Goat meat
Eggs & Poultry
Environment & Climate Change
Rural Development
Forestry
Organic farming
Fisheries and Aquaculture
Social dialogue / GEOPA
Pigmeat forecast group
Eggs & Poultry forecast group
International Aspects of Agriculture (Trade)

Figure 1: Regional profile of Irish Agriculture by Farm System


[Source: Teagasc National Farm Survey, 2022]

Southern	
Farm System	No. of Farms
All Systems	37,326
Cattle Other	12,602
Cattle Rearing	5,896
Dairying	10,970
Sheep	3,281
Tillage	3,406

Northern and Western	
Farm System	No. of Farms
All Systems	30,995
Cattle Other	10,572
Cattle Rearing	9,534
Dairying	2,199
Sheep	8,439
Tillage	92

Eastern and Midland	
Farm System	No. of Farms
All Systems	16,738
Cattle Other	6,624
Cattle Rearing	2,999
Dairying	2,072
Sheep	2,259
Tillage	2,457



SECTION 3:

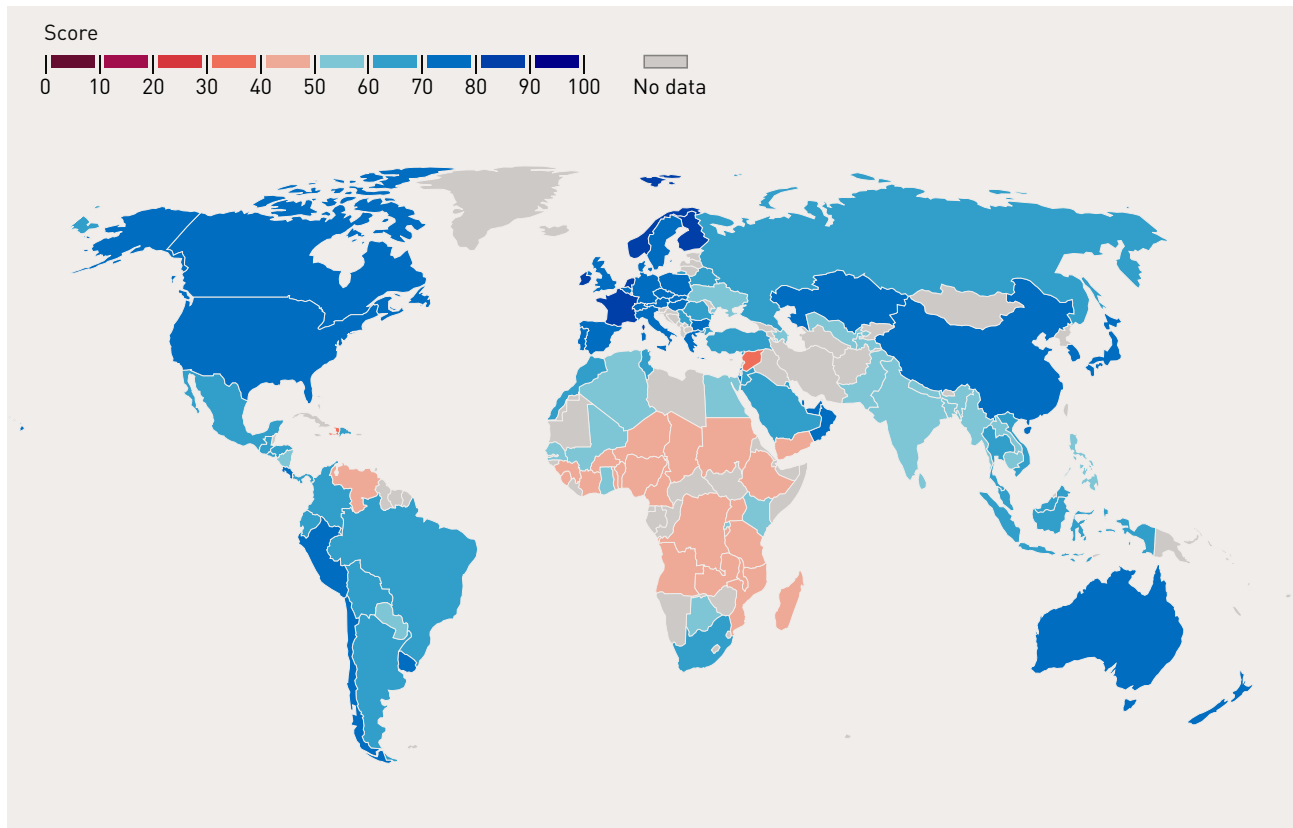
Farmers deserve better recognition for the positive contribution they make to society

The role and contribution of Irish and European farmers and food production to society is increasingly being de-valued, including amongst our elected representatives.

Much reflects the diminished intergenerational connectivity with farming; a lack of empathy or true understanding of the realities and challenges at farm level, but certainly, here in Ireland, we have an industry and a model of production the envy of Europe and beyond, to be immensely proud of.

Our agri-food industry, thanks mainly to the hard work, dedication and commitment of farm families the length and breadth of rural Ireland, has Ireland among the most food secure and sustainable nations globally¹, consistently delivering a wide range of high quality, safe and nutritious food ingredients not only of benefit to Irish consumers on a daily basis but to more than 40 million consumers worldwide.

Figure 2: Global Food Security Index (GFSI)



1 Global Food Security Index (2023)

Table 2: Global Food Security Index - Ireland

Ireland	Rank (/113 countries)	
Overall	2 nd	
Affordability	4 th	Measures the ability of consumers to purchase food, their vulnerability to price shocks and the presence of programmes and policies to support consumers when shocks occur
Availability	15 th	Measures agricultural production and on-farm capabilities, the risk of supply disruption, national capacity to disseminate food and research efforts to expand agricultural output.
Quality and Safety	9 th	Measures the variety and nutritional quality of average diets, as well as the safety of food
Sustainability and Adaptation	3 rd	Assesses a country's exposure to the impacts of climate change; its susceptibility to natural resource risks; and how the country is adapting to these risks.

With exports spanning 190 markets worldwide, worth an estimated €19 billion (+76% over the past decade, largely driven by value rather than volume), the sector has a global reputation for quality and safety – attributes to be promoted and fostered as global demand for sustainably produced food increases in the years ahead, and climate change exerts increased influence on certain regions.

The agriculture sector represents the foundation stone on which economic activity and employment (both upstream and downstream) revolve in many towns, villages and surrounds throughout rural Ireland. The sector employed 164,900 people (6.5% of total employment) in 2022, across 135,000 farms, 300 aquaculture sites and some 2,000 food production and beverage enterprises².

Beyond direct employment and agricultural value, the sector plays a key role in the wider rural and local economy, with DAFM³ estimates for output multipliers ranging from around 2.5 for beef, 2.0 for dairy and food processing, and 1.75 for seafood. This compares with an average output multiplier of 1.4 for the rest of the economy and 1.2 for foreign owned firms.

The agri-food sector was instrumental in pulling the Irish economy out of deep recession after 2008, but enjoyed limited benefits itself. Indeed, there has been a clear and obvious reduction in farmers share of the value chain – see table 3 – with their purchasing power, and that of rural areas more generally, as measured in GDP per capita, considerably below that of urban dwellers.

Table 3: Value of Agri-Food exports and Average Aggregate Farm Income 2017-2023

	2017	2018	2019	2020	2021	2022	2023
Value of Agri-Food exports (€bn)	12.6	12.1	13.2	13	13.5	16.5	16.3
Av. Farm Income (€'000)	36.4	41.6	33.7	33.3	57.9	44.9	24.8

(Source: Bord Bia Export Performance and Prospect Reports and Teagasc National Farm Survey, various years)

While the integral role and importance of foreign-direct investment to the national economy cannot be contested, DPER⁴ data suggests that aggregate direct expenditure⁵ from Irish-owned firms are comparable with foreign owned firms (€35.9bn vs €38.1bn), with significantly higher proportions of food, drink and primary production sales consumed locally relative to foreign owned firms.

² Annual Review and Outlook for Agriculture, Food and Marine (2023)

³ Department of Agriculture, Food and the Marine

⁴ Department of Public Expenditure and Reform

⁵ Direct expenditure reflects expenditure afforded to payroll and the purchases of Irish materials and services


Table 4: Summary Table of Key Business Indicators (current prices), 2022

	2022 (€bn)			Share of Total 2022		
	Foreign-owned	Irish-owned	All	Foreign-owned	Irish-owned	All
Sales	403.5	62.3	465.8	86.6%	13.4%	100%
Exports	386.3	33.0	419.2	92.1%	7.9%	100%
Value Added	169.3	21.2	190.6	88.9%	11.1%	100%
Direct Expenditure	38.1	35.9	73.9	51.5%	48.5%	100%

Note: Rounding may affect totals. This table shows sales, exports, value added and direct expenditure for 2022 by ownership. (Source: Department of Public Expenditure and Reform)

Irish farming is a world leader in grass-based food production and is a highly emissions-efficient, sustainable food production model. **Irish milk has the lowest carbon footprint in the EU while Irish beef has the fifth lowest.** This must be remembered, in the context of increasing demand for food, due to projected population growth, when constraints are put on Irish production and/or international trade deals (e.g. Mercosur) negotiated. Carbon leakage will only amplify our climate problems.

- In Ireland emissions from beef production vary from 18.9 – 21.1 kg CO₂-e kg beef⁶ while Brazilian emissions are more than 30 kg CO₂-e kg beef.
- The carbon footprint of Irish milk is 74% more carbon efficient than milk produced in India and 42% more carbon efficient than Chinese milk⁷.

Farmers **own and manage over half the national forest estate** (400,000ha); and since 1980, account for over 80% of new planting (even with a broken system).

We have the **3rd largest (700,000km) total hedgerow area in the EU** and, since 1994, farmers have planted more than 6,500km of new hedgerow (that is more than twice the Irish coastline).

Irish farmers have a strong track record in participating in agri-environment schemes (2.5 times the EU average - 33% of Ireland's land is farmed under agri-environment measures vs 13% at EU-27 level). There has been **phenomenal demand and over-subscription** in the National Liming programme and **agri-environmental (ACRES) schemes**, which in the short-term, in addition to improved soil fertility will deliver (per ACRES Tranche 1 actions):

- Extensively Grazed pasture – 182,850ha
- Wild Bird Cover – 7,000ha
- Catch crops – 22,000ha
- Riparian Buffer Zone – 5,500km of watercourse being fenced
- Field margins – 804km
- Barn Owl Boxes – 11,500 boxes.

Elsewhere, by way of recent examples of farmers commitment to biodiversity and climate change:

- 97% of BISS applicants have committed to eco-scheme's
- 100% increase in applications looking to join the Organic Farming Scheme
- 33% fall in fertiliser sales since 2021; with the quantity of protected urea sold (lower emissions vs urea) in 2022 increased more than 50% on 2021 levels; and ground limestone usage, which was up 50% in 2021 compared to 2020, increased by a further 4% in 2022.
- **Overall GHG emissions from the sector have reduced 1.2% in 2022⁸.**
- Almost 1,500 applications for TAMS⁹ roof-top solar (whose emission benefit goes to the energy sector) and 1,300 applications for low emission slurry spreading investments.
- In 2022, 75% of slurry on the average dairy farm and 34% on the slurry on the average cattle farm was applied via LESS¹⁰

Fundamentally, agriculture is, and must continue to be, at the core of the European Union, as a strong and common policy, backed by an ambitious EU budget and limited degree of subsidiarity to better reflect local conditions and resources.

6 Teagasc (2011). Irish Agriculture, GHG Emissions and Climate Change: opportunities, obstacles and proposed solutions. Retrieved from: https://www.teagasc.ie/media/website/publications/2011/61_ClimateBillSubmission.pdf.

7 Mazzetto et al. (2021). Mapping the carbon footprint of milk for dairy cows. <https://www.dairynz.co.nz/media/5794083/mapping-the-carbon-footprint-of-milk-for-dairy-cows-report-updated.pdf>.

8 <https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/agriculture/>

9 Targeted Agriculture Modernisation Scheme

10 <https://www.teagasc.ie/media/website/publications/2023/SustainabilityReport2022.pdf>

Figure 3: Profile of EU Agriculture (2020)

- 9.1m EU agricultural holdings – of which almost one-third (2.9m farms) in Romania
- Approx 95% of EU farms are family farms (50% plus regular labour from family members), with family farms the dominant farm type in all Member States .
- Almost two-thirds of EU farms were less than 5 hectares; 7.5% were 50ha or more
- Almost two-thirds (63.7%) of EU farms had a standard output below €8,000/year

Source: EU Commission

The EU farming model overall is based on diversified, local, and family farm structures (c.95% are family farms¹¹). However, losing close on 1,000 EU farms per day today, the sector is at a pivotal juncture.

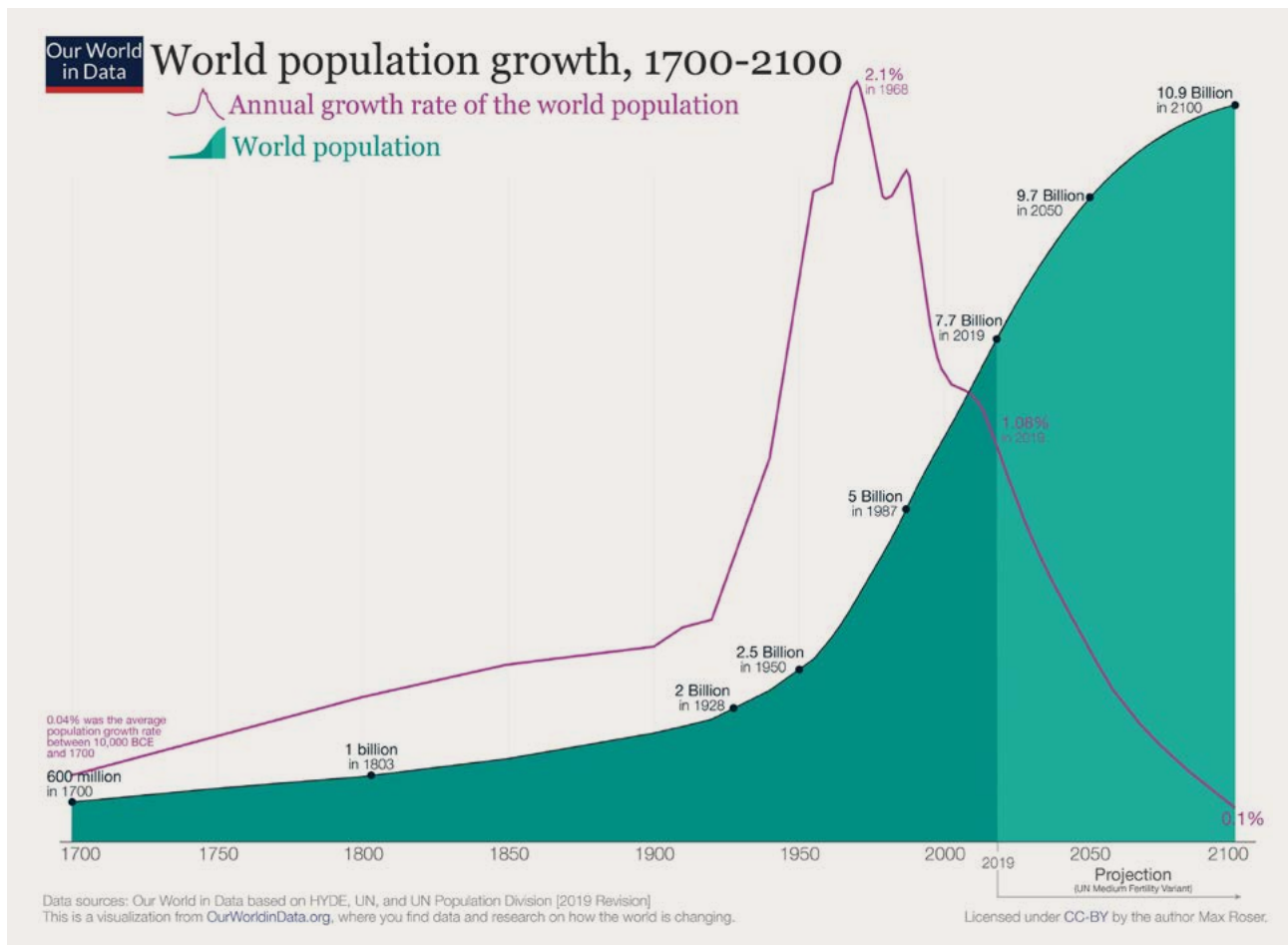
Between 2005 and 2020, the number of EU farms decreased by about 37% (i.e. 5.3million across all Member States – more

than one farm per every Irish resident currently), the vast majority of which (about 87%) were small farms of a size under 5 hectares.

This exodus mainly reflects the realities that farming is now a much more complex and difficult job than it was in the past; is not extremely attractive for younger generations; and often, is not always economically viable. Operators are exposed to numerous challenges, including:

- Constantly evolving and challenging legislation not adapted/appreciative of its impact on operation viability,
- Increasingly restrictive environmental requirements without the necessary support to implement them,
- Increasing administrative burden and bureaucracy, and
- Market volatility with more frequent extreme climatic conditions with limited mitigation tools.

The geo-strategic importance too of the agricultural sector cannot be overlooked. Farmers are the ones that put food on your table, helping not only deliver food security for 450 million European citizens, but contributing also to global food security.

Figure 4: World population growth 1700-2100


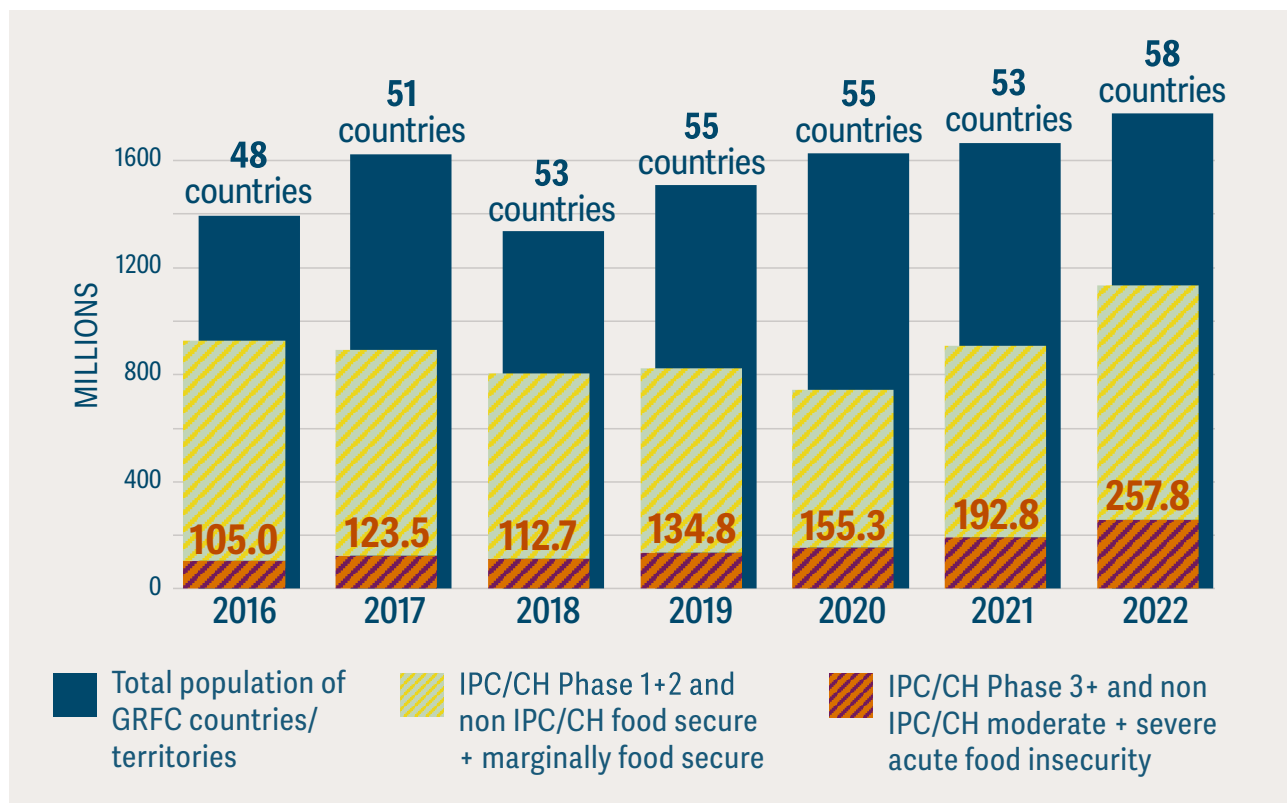


The United Nations¹² report that the world's population is more than three times larger than it was in the mid-twentieth century, and is expected to increase from the current 8 billion to 9.7 billion in 2050 and could peak at nearly 10.4 billion in the mid-2080s.

OECD report that agricultural growth, although continuing to increase, is increasing at a slower rate than previously; a reflection of lower levels of investment in research/innovation; climate change etc. It also suggests that productivity needs to increase by 24% within the next two decades to meet likely demand, and it is not as if we are starting from a great base, from a global context.

Globally, acute food insecurity unfortunately, in light of conflict and insecurity; economic shocks/stress; and weather extremes, is on an upward trend. In 2022, it affected up to 258 million people in 58 countries/territories¹³, more than double levels just five years previous.

Figure 5: Number of people in GRFC countries/territories facing acute food insecurity, 2016–2022



Source: FSIN, using data from 2016–2022. (Note: GRFC = Global Report on Food Crises)

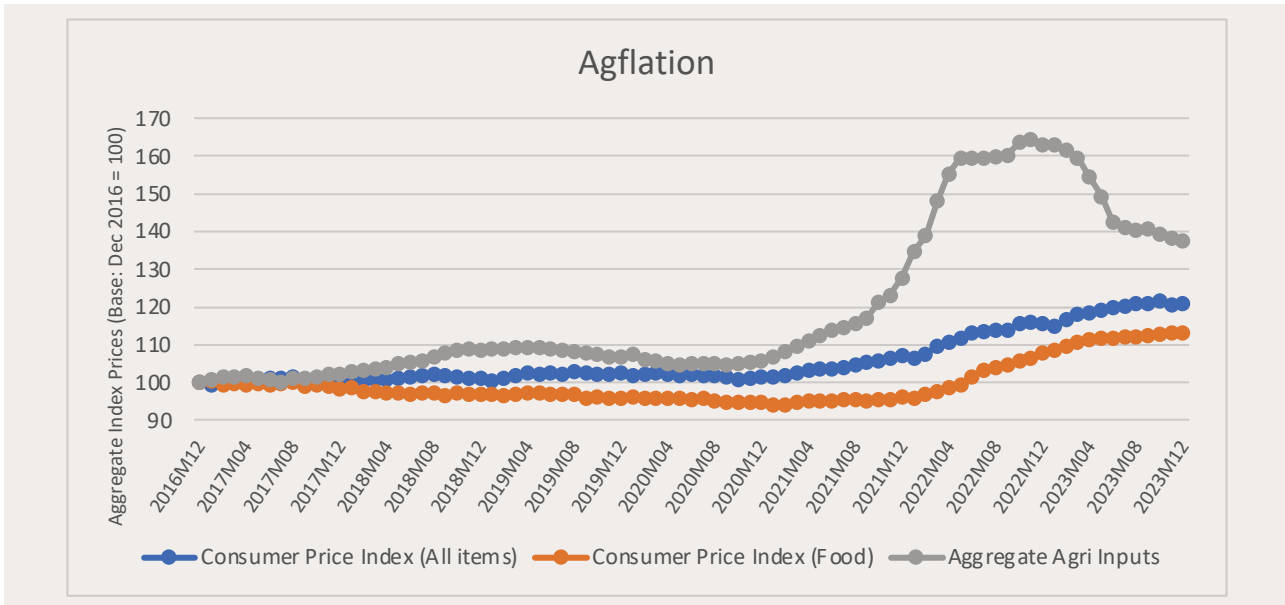
Every EU country must assume its global responsibilities and ensure the ability to produce food now and in the future.

IFA propose:

- The Union's promotion policy, used to increase awareness of the qualities of EU agricultural and food products (across all sectors), must be funded by a strong budget.
- Undertake a strategic and co-ordinated positive communication campaign, across multiple media, to better profile all the positive externalities agriculture brings to food security; the survival and vitality of all other sectors of the economy; rural communities and development; environment and social sphere etc.

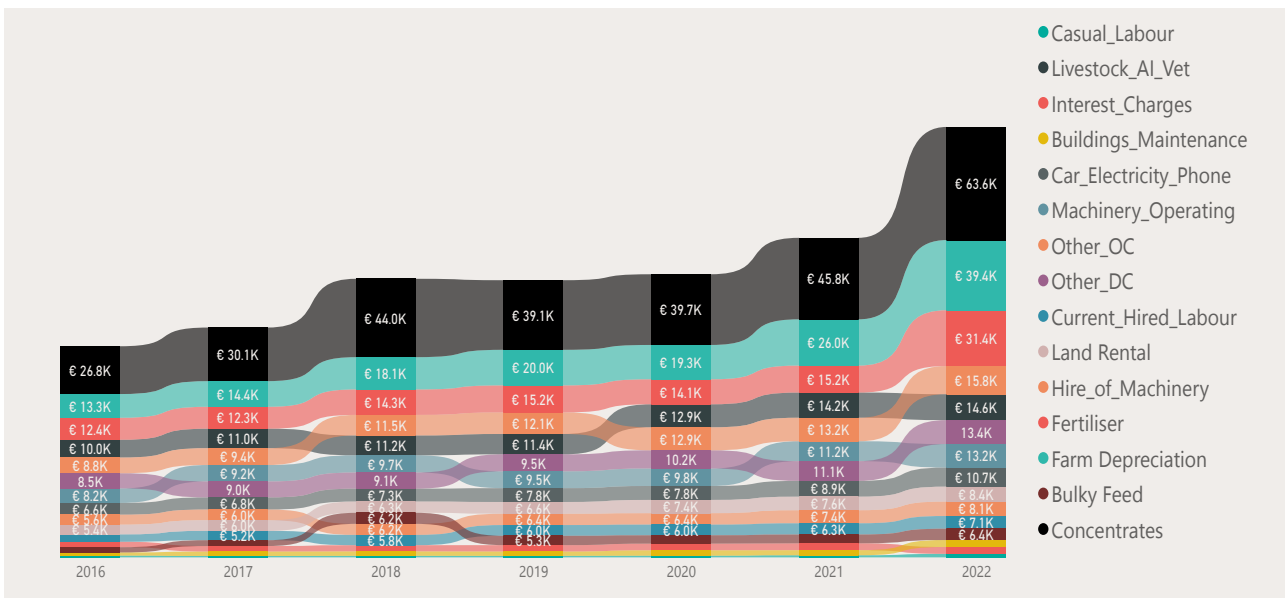
12 <https://www.un.org/en/global-issues/population#:~:text=The%20world%20population%20is%20projected,and%2010.4%20billion%20by%202100.>

13 Global Report on Food Crises (2023).

Figure 6: Agflation continues as On-Farm Cost of Production remains above past levels

Table 5: Relative change in select Aggregate Index Prices to December 2023

	Aggregate Agri Inputs	Consumer Price Index	Food Price Inflation
Dec '23 vs. Dec '21	7.6%	13.2%	17.9%
Dec '23 vs. Dec '22	-15.6%	4.6%	5.2%
Dec '23 vs. First Covid-19 case in Ireland	29.4%	18.4%	18.3%
Dec '23 vs. new EU/UK trade realities	28.9%	19.3%	20.4%
Dec '23 vs. onset global energy crisis	20.9%	16.8%	19.1%
Dec '23 vs. onset of Russia/Ukraine conflict	-0.9%	12.5%	17.0%

(Source: Central Statistics Office, 2024)

Figure 7: Selected costs per farm 2016-2022


(Source: Teagasc National Farm Survey, 2023)

SECTION 4:

Farmers need a Fair Income and Standard of Living for Current and Future Generations

Despite consistently delivering a wide range of the highest quality food ingredients globally, and all the positive externalities outlined above, most farmers themselves struggle to obtain a positive market return for their endeavours – a derivative of stubbornly high costs of production (particularly post energy crisis; Covid-19; Ukraine conflict); diminished / diluted CAP payment receipts (amplified with the shift to result-based system) and farmers failing to secure their fair share of the value chain.

Combined, it explains why there is a huge dependence on direct payments, and why succession remains a challenge (there are currently more than four times more farmers aged over 65 years of age than there are under 35 years of age). Easier, more financially lucrative employment lies elsewhere.

These, along with challenges posed by potential EU enlargement, must be addressed urgently.

Figure 8: Average farm income in Ireland 2020-2022

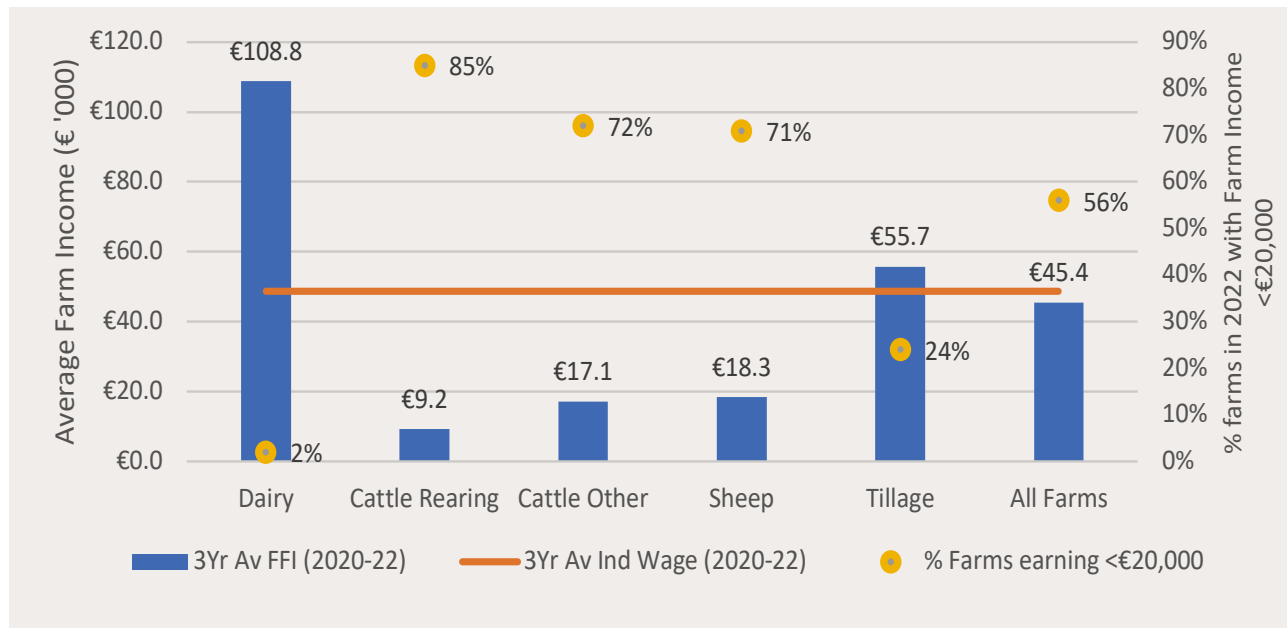


Figure 9: Viability of Irish farms 2022

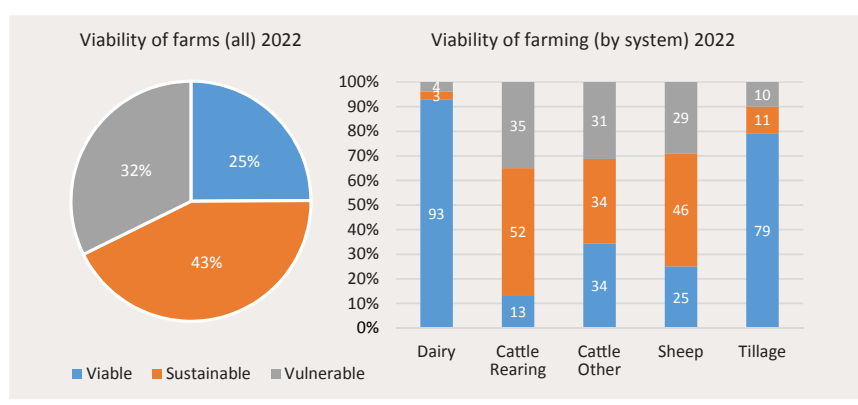
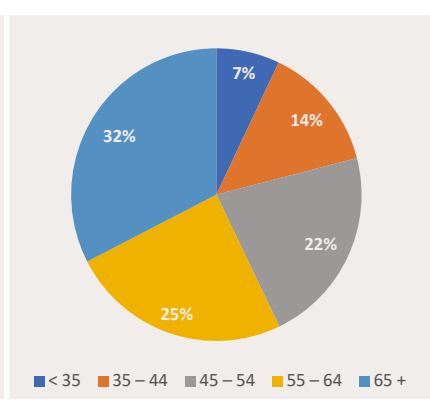


Figure 10: Age of farm managers 2022



(Source: Teagasc National Farm Survey, 2023)

EU Enlargement

There are currently 9 countries looking to join the European Union [Ukraine, Moldova, Georgia, Albania, Bosnia and Herzegovina, Montenegro, North Macedonia, Serbia and Turkey], which, if achieved, would have a major impact on the EU food market and agricultural policy, and must be managed carefully.

Table 6: Relative size (UAA) of EU & Ukrainian agriculture

Utilised agricultural area	Million ha
EU Total	157.4
Ukraine	41.1
EU + Ukraine	198.5
& Increase by adding Ukraine	21%

Ukraine is larger than France and Italy combined

From a potential financial impact (over seven-year period), EU enlargement, per EU Council estimates, would cost in the region of €256.8bn, and potentially a c.20% cut to farm

subsidies. Ukraine accession alone would cost c.€186bn, of which €96.5bn in CAP funds (making it, given its 41.1m hectares of utilised agricultural land, the bloc's largest recipient of CAP funds). Adding the other eight countries would cost a total of €29.9bn in CAP payments.

While unlikely any will become full members before the end of the existing CAP programme, two countries, Ukraine and Moldova, are at a more advanced stage, with open negotiations toward accession ongoing since mid-December 2023. Careful planning is required, both from financial and trade perspectives, so as to preserve the integrity of EU budgets and the EU Single Market.

IFA propose

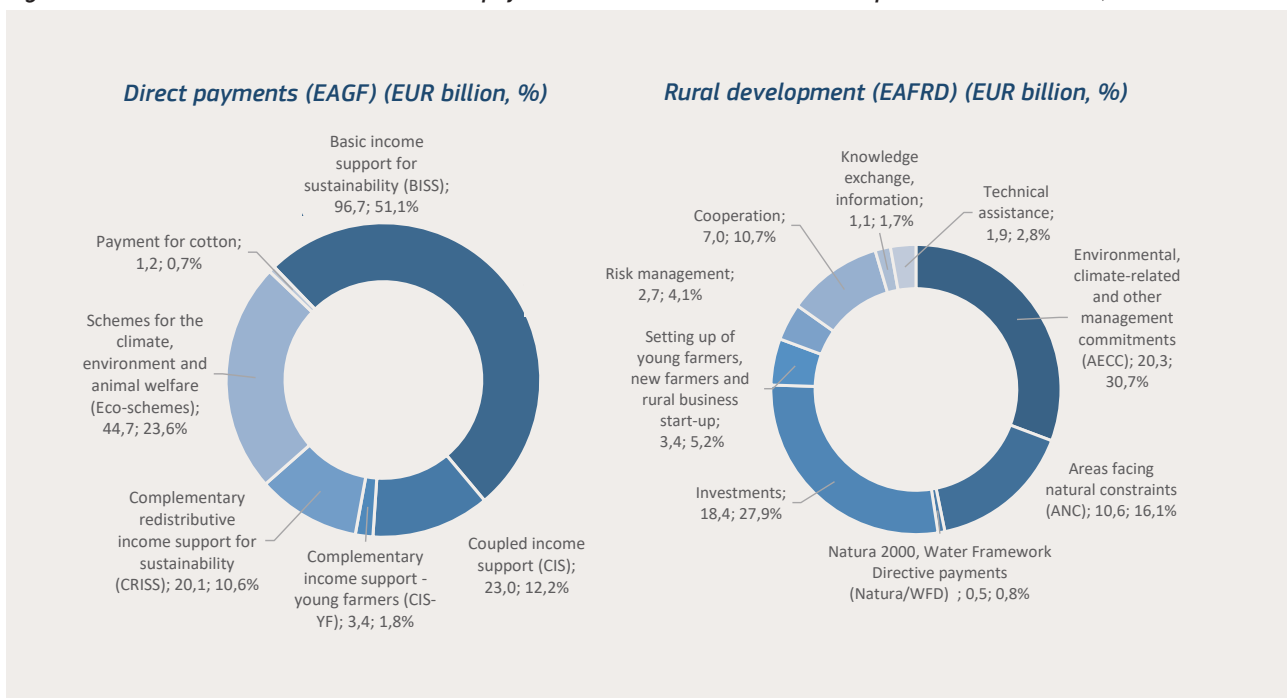
- **A full impact assessment (financial, trade etc) of the fitness of the CAP and the broader EU Single Market must be undertaken in advance of future EU accession, with innovative solutions regarding EU budgets and policies implemented in advance, where required.**

A simplified, fully-funded CAP is needed

CAP has traditionally been the largest EU policy, accounting for 1/3 of the EU budget (€387bn in 2021-2027 period), the vast majority (€291bn) of which comes from the European Agricultural Guarantee Fund (EAGF) whose job is to support

agricultural production; and the remainder (€95.5bn) from the European Agricultural Fund for Rural Development (EAFRD) which is mostly focused on supporting farming communities.

Figure 11: Planned distribution of EU27 direct payments (EAGF) and EU rural development (EAFRD) funds, 2023-2027¹⁴



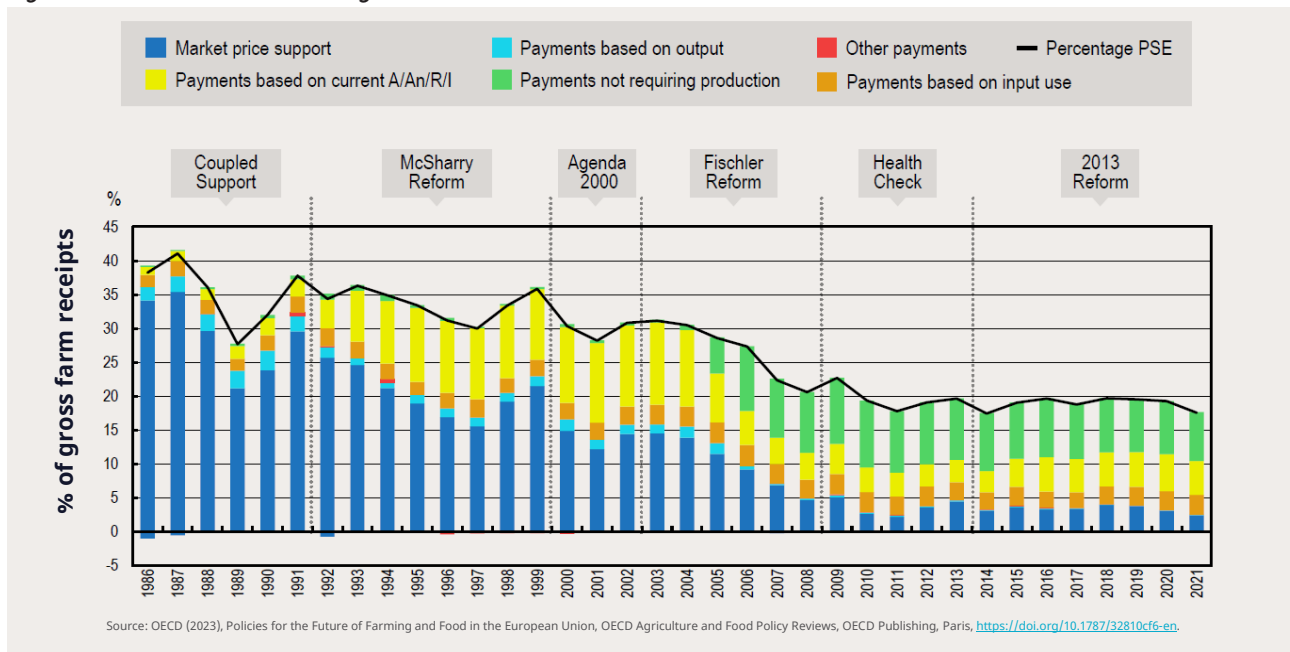
The CAP has transitioned from a food production support policy for EU farmers to a complex, administratively difficult environmental payments model. The next CAP must revert back to the original purpose of the Policy, ensuring high quality affordable food for EU citizens produced by EU farmers, by directly supporting on farm production.

The value of CAP has been in decline in real terms for almost two decades. Notwithstanding, CAP remains integral to the economic sustainability of most Irish farms, across almost all farm sectors.

Table 7: Average value of direct payments (DPs) and contribution of FFI 2022

	DPs (€)	Contribution of DPs to FFI (%)
Dairy	21,103	14
Cattle Rearing	15,130	182
Cattle Other	17,129	92
Sheep	18,948	116
Tillage	30,143	40
All	18,948	42

Figure 12: Evolution of CAP funding



[Source: Teagasc National Farm Survey, various years]

Figure 13: Evolution of Agricultural Supports 2000-02 to 2020-22 across select regions

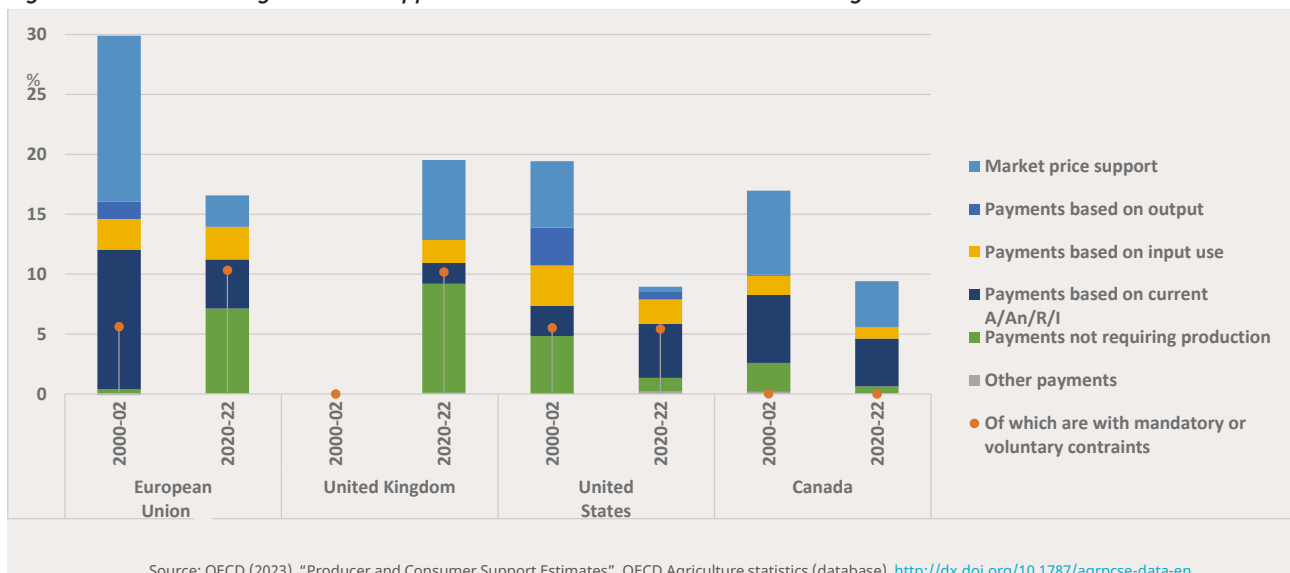
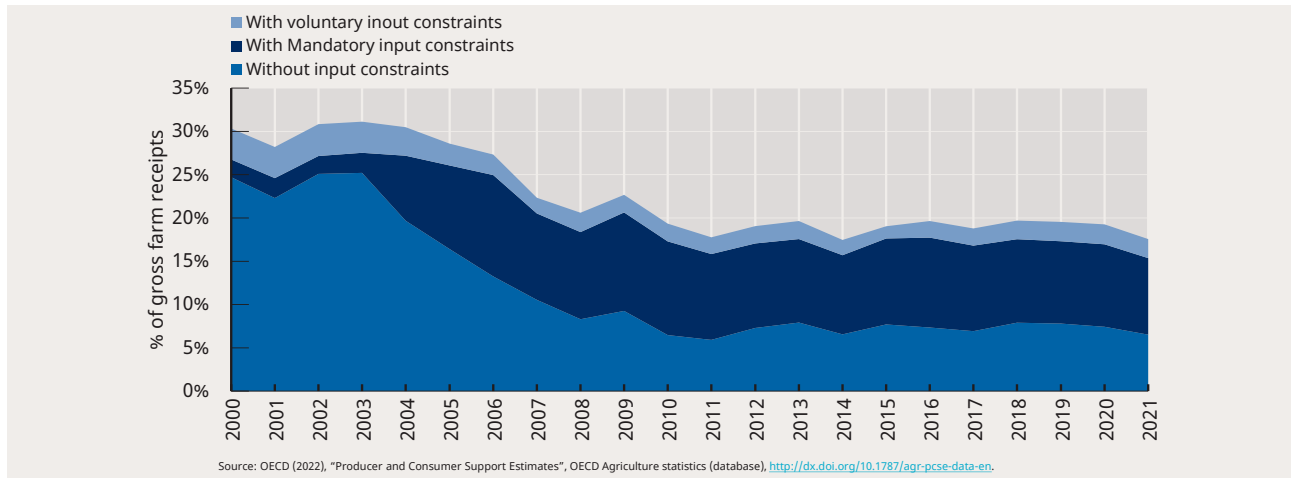


Figure 14: More Payments with constraints


15

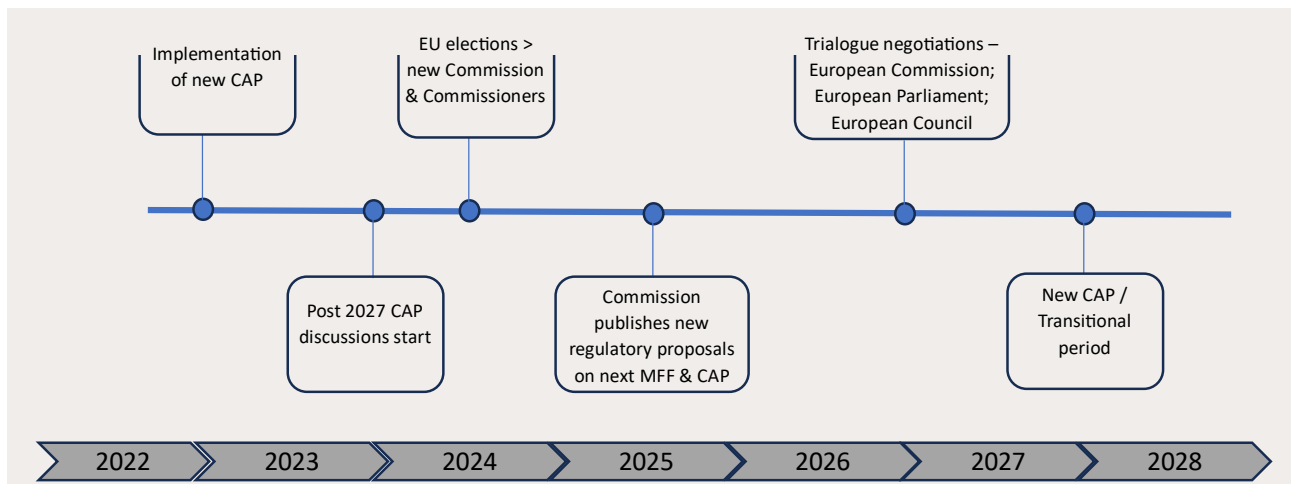
The new Common Agricultural Policy started on January 1st 2023, but already attention and consideration regarding its design post 2027 has started.

After the European elections in 2024, and the subsequent appointment of the new EU Commission, political deliberation on the next CAP support period framework will begin.

Based on past experience, this may take a number of years and require the implementation of 'transition years' following the present CAP period of 2023-2027. Where required, it is

essential farmers are advised of this early, so agricultural businesses can plan accordingly.

Political and societal expectations for farmers to provide public services are rising significantly, owing in part of the goals of the 'Green Deal'. Farmers must be able to provide services to society while also making a profit. As a result, the EU agricultural budget and its income effectiveness for farmers must be increased, taking current developments into account, such as inflation and new EU accession countries.

Figure 15: Timeline for new CAP post 2027:


Multiple schemes / payments now replace their predecessors – e.g. BISS/CRISS/Eco-scheme vs BPS/Greening, resulting in significant internal administrative and technical re-design with limited lead time at National level, where farmers ultimately suffered.

In Ireland, in 2023, the first year of its implementation, CAP (2023-2027) caused delayed receipt of key farm payments (in a cost-of-living crisis); coupled with reduced net benefit at farm level from scheme participation given income foregone/cost incurred approach taken and increased 'leakage of CAP funds' away from primary producers to contracted third parties.

CAP Strategic Plans (CSP) contain all the details of how the CAP is applied in each Member State, underpinned by the principle of subsidiarity, wherein Member States have greater flexibility with regard to its implementation at local level. How real the principle of subsidiarity actually is, is questionable, given the reluctance of Member States to innovate for fear of subsequent audit, but an additional limitation is that the CAP Strategic Plans Regulation (EU) 2021/2115 only allows the Plans to be amended once per year, plus three additional amendments during the whole period. Surely greater opportunity to amend as required is necessary.



IFA propose:

- Increase CAP funding to better align with increased objectives and possible EU enlargement, or reduce the conditionality requirements on farmers;
- CAP, and its mechanisms, must put farmers and food production at its core in design;
- Alleviate the burden of proof to receive direct support by relying on self-declaration and/or other mechanisms;
- Continuation of the elevated state aid ceiling of €250,000 and €300,000 for the agriculture and fisheries sectors currently in place until June 2024;
- The CAP budget for organics must be maintained, even with recent new entrants, the area under organic production remains significantly below the European average;
- Minimise the supporting documentation required in individual Targeted Agricultural Modernisation Scheme (TAMS) applications, and where Ministerial agreement for 100% approval to eligible applicants is provided – enable Department to progress without obligation for applications to undergo Rank and Selection stage.
- Proactive individualised communications with farmers in advance of action deadlines so as to minimise non-compliance and/or associated appeals/penalties etc
- An increased number of amendments to the CSP should be accommodated.
- Reduce excessive conditionality requirements. The inflexibility of the three-crop-rule and crop diversification requirements (GAEC 7) after severely disrupted autumn planting seasons is very frustrating for farmers. Similarly, the requirement under GAEC 6 to have a grassland lie-back when grazing forage/catch crops with livestock has now totally phased out the sustainable practice of integrating livestock into cropping systems. This should be corrected.

Aligned with above, conditionality sets the baseline requirements for farmers in receipt of CAP payments, replacing “cross compliance”, and is implemented via Statutory management Requirements (SMRs) and Good Agricultural and Environmental Condition (GAEC).

There are a number of GAEC’s that are particularly concerning for farmers in the short-term:

GAEC 2: Protection of peatlands and wetlands

Although a derogation has been secured to 2025, GAEC 2 is a new GAEC standard that, through on-farm management practices, seeks to avoid/minimise carbon release alongside the protection of wetlands and peatlands. While yet to be finalised in terms of what it might mean at farm-level, initial DAFM options suggest farmers operating on peatland/wetlands would no longer be able to undertake new drainage works; deep plough; or convert grassland to tillage or arable crops, with restrictions on turf cutting activities also proposed.

These proposals will hit farms hard, and not only have a

substantial economic impact on farmer incomes but on the value of impacted lands too. Some are not only contrary to existing Government policy (e.g. promoting increased Tillage production nationally) but go way too far, and is something IFA cannot accept. In many respects, they are effectively designating of all of Ireland’s peatlands ‘GAEC 2 lands’ by the back door. The experiences of farmers currently operating on designated lands is less than ideal. False promises were made in the past regarding compensation and operational efficiencies. This must be rectified in first instance, and the same mistake avoided at all costs.

In terms of coverage and impact, Irish farmers are among the most exposed in the EU given approximately 18% of Ireland is defined as peatland, one of the highest shares in the EU.

Initial estimates by the Irish Department of Agriculture suggest, using Teagasc-EPA Soils and Subsoils mapping, that almost one-in three Irish farmers could be impacted (c. 42,000 of c. 130,000 farmers) by GAEC 2 restrictions, with higher concentrations in the Midlands and along the rural Western seaboard of Ireland. Numbers may be even higher if new maps become available and are utilised, which will further amplify the problems arising from the proposed implementation. It must be acknowledged and clearly recognised that these are mainly extensive family farm-run operations, across all farm sectors, who are the lifeblood of their local communities. Any impact on farm operations will have wider socio-economic repercussions, and before any GAEC 2 standard is applied in Ireland, its economic impact must be clearly understood.

IFA propose:

- In the first instance, any implementation of GAEC 2 should be postponed with a further derogation provided to Member States to allow additional analysis. This derogation should be available annually to Member States to the end of the current CAP programme.

GAEC 7: Crop rotation in arable land

Irish arable farmers have emerged from a very difficult season in 2023. Economic analysis from Teagasc, the Irish National Agriculture and Food Development Authority, has highlighted a 60% drop in incomes on these farms relative to 2022.

Weather conditions in the autumn of 2023 across Europe were extremely challenging and Ireland was no exception to this. Only 62% of winter cereal crops were established in Ireland during this period. This situation has been compounded by a shortfall in the availability of spring seeds. Planting of winter cereal varieties was planned up until mid-February as a solution to alleviate the shortage of spring seeds, however, this has not been possible due to unsettled weather conditions.

IFA propose:

- A continuation of the derogation from GAEC 7 requirements of the three-crop rule and a review of crop diversification requirements should also take place in 2025.

Ultimately, it is especially important to keep the CAP a policy in its own right – a partnership between agriculture and society, and between Europe and its farmers in order to ensure the sustainability of agriculture and food production, with the main focus on ensuring food security, a stable and affordable supply of food produced at high standards.

The CAP must therefore aim to secure an improved income for farmers. In carrying out their activities, they must be an incentivised approach (going beyond the costs incurred / income foregone approach) targeted at active farmers, rather than imposing interventions for environmental and social practices.

While we understand that EU's budgetary needs are many, but supporting additional actions/policies should not come at the expense of the CAP budget. Without improved funding for CAP, farmers will not be able to provide food security to consumers; fight climate change; improve environmental performance; address generational renewal; maintain vibrant rural areas; and globally contribute to create growth and jobs in the EU.

Rural Development Programme

A strongly funded Rural Development Programme (RDP) under Pillar II is vital for rural areas. Funding must be made up from a high EU contribution combined with significant national co-financing.

IFA propose:

- Targeted sectoral support: sucklers (€300/cow), sheep (€30/ewe), tillage (€250/ha for Tillage Survival Scheme in 2024; €400/ha in 2025 [€250/ha in 2026-2028] for additional [and retained] cereal crops grown), calf rearing (€100/dairy beef calf); beef sustainability (€100 per dairy and suckling yearling).
- Whole farm environmental schemes, similar to REPS, with a minimum payment of €15,000 per farm, and higher payments for designated Natura SAC and SPA lands. Interested farmers (including young farmers / new entrants post 2022) cannot be left without an agri-environment scheme until post-2027 CAP Programme.
- An increased annual allocation of over €300m for the ANC scheme.
- TAMS investment scheme be made available for all sectors, with 70% grant aid for young farmers; and organic farmers; and 50% for all others.
- Increased TAMS grant aid of 70% for slurry storage investment to be made available to all farmers regardless of their current levels of on-farm slurry storage.
- Strong measures to support committed young farmers across all schemes.
- Minimise leakage of funds for advisory and service providers

Unfair Trading Practices

The EU Directive on Unfair Trading Practices (UTP) was transposed into Irish law¹⁶ in April 2021. This is a step in the right direction, but on its own, the UTP regulations will have minimal effect. There is no recognition of the cost of production in the UTP regulations.

The lack of competition in many sectors must be addressed by Government and the EU Commission. There needs to be full price and margin transparency at all levels in the food chain, so that margins and profitability of processors and retailers are clearly visible.

A fairer distribution of the price returns across supply chains must occur, from retail back to the primary producer, and farmers must receive a price above the costs of production, which provides a viable margin.

An Rialálaí Agraibhia (Agri-Food Regulator) is an independent statutory Office established under the Agricultural and Food Supply Chain Act 2023, concerned with promoting fairness and transparency in the agri-food supply chain. Its statutory remit and focus are on business-to-business relationships within the supply chain.

IFA propose:

- Greater powers are given to An Rialálaí Agraibhia (Agri-Food Regulator) to address price in the food supply chain, including below cost selling.
- Below cost selling must be prohibited, and enshrined into Irish law. The discounting and degrading of food must be stopped. Retail buyers must be held accountable for the declining number of farmers in our vulnerable sectors (fresh fruit, vegetables, liquid milk, pork, poultry) that depend on the domestic retail market.
- The Bord Bia Quality Assurance (QA) schemes are the recognised QA standard for Irish agri-food products. IFA do not accept additional QA requirements from retailers, consolidations or processors.

EU Environment Fund

The single biggest barrier to meeting the climate action targets is the financial vulnerability of many farms, as it limits their ability to adopt new practices and stifles innovation.

New funding mechanisms need to be established to support the additional societal and environmental asks that will be imposed on farmers to meet the carbon reduction targets.

Emerging voluntary and regulatory ecosystems services payments such as the proposed carbon farming schemes need to be developed to appropriately incentivise farmers if progress is to be made along the transition pathway.

The CCAC Carbon Budget Technical report highlights new opportunities exist for Ireland to further develop exports arising out of the low carbon transition including alternative



proteins, low carbon dairy end products, bio-economy products and carbon credits/carbon management.

Farmers view considerable potential in renewable energy, either to produce energy for their own use or to diversify their farm income by selling excess energy to the grid and enhancing the sustainability of their farm business. Farmers need to be central players in Ireland's energy transition.

Ireland's adoption of renewable technologies at farm level is well below the European average. In 2018, Ireland ranked 23rd out of the EU-27 countries for renewable energy from agriculture, producing just 2.6% compared with the EU-27 average of 12.1%.

Carbon farming is a potential income source, but needs to be designed carefully

Agriculture is unique in its ability to remove carbon from the atmosphere by carbon sequestration through enhancing carbon sinks.

A recently published European Commission report¹⁷ showed that result-based carbon farming can contribute significantly in the EU's efforts to tackle climate change, bringing benefits in terms of carbon sequestration and storage while offering new income opportunities for farmers.

It has the potential to become a win-win. However, the success of a future carbon farming scheme in Ireland and the scale of adoption will be completely dependent on the level of financial commitment from the Government and also what's included in the mix. Current proposals at EU level include a mandatory biodiversity benefit, yet fails to recognise synergies between livestock farming, land management practices capable of capturing carbon, and of enhancing alternative energy sources.

A major disadvantage for the sector is that currently there is no measurement, reporting and verification (MRV) for carbon sequestration in Irish grassland or peat soils. The establishment of National Agricultural Soil Carbon Observatory, commenced intensive monitoring of carbon emissions and removals in 2021 across a range of Irish soils. However, it will be a number of years before evidence-based measurement, reporting and verification of carbon sequestration can be achieved.

IFA propose:

- Carbon sequestration solutions enhance climate action and, if implemented correctly, bring incentives and additional income potential to landowners. The importance of soil carbon sequestration must be taken into account in the calculation of carbon balances. The proposed additionality requirement that farmers would only be eligible for a carbon payment for new actions or measures implemented to remove carbon is viewed negatively by farmers, as it (i) does not value the existing carbon reservoir in soils and or hedgerows on farms and (ii) penalises earlier adopters of practices that have improved carbon removals and prevents them from earning payments. Carbon markets must enable real market possibilities for farmers and foresters.

Anaerobic Digestion (AD) / Biomethane industry

The IFA is fully supportive of the development of a farmer led, agri centric, Anaerobic Digestion/Biomethane Industry in Ireland.

IFA propose:

- A National Biomethane Strategy should be developed that allows **full farm participation** in AD and the confidence to invest in AD.
- **Full reflection of the emissions savings realised from the production of biomethane from agriculture feedstock must be allocated to agriculture in the national inventory.**
- Introduce a Renewable Heat Obligation scheme (RHO) with **sustainable subsidies** as soon as possible to support the wide scale development of an AD sector. This will give greater certainty and security of revenue for farmer led projects.
- Provide **capital grant** funding to support the construction of viable on farm AD plants and for on farm storage of digestate from AD plants. This funding must come from the Department of Energy and Climate Change budget.
- **Government backed finance** (similar to current SBCI lending structures) to be provided to enable farmers develop AD plants.
- Introduce a **biomass mobilisation scheme** to support farmers to coordinate, mobilise and establish a sustainable feedstock supply chain for AD plants.
- **Streamline current regulations** to support the development of AD plants, in particular farm scale AD plants, with statutory timelines imposed on regulatory and licensing authorities. National guidelines are required so all local authorities can assess possible AD projects under the same criteria.
- Ensure the **maximum amount of farm slurries and farmyard manures** are used in AD plants in Ireland.

¹⁷ European Commission (2021). Technical guidance handbook: Setting up and implementing result-based carbon farming mechanisms in the EU. <https://data.europa.eu/doi/10.2834/12087>

- **Minimise the displacement of human food production** for the supply of feedstocks for AD plants in order to safeguard Food Security.
- **No agricultural feedstocks supplied to AD plants to be classified as waste.**
- Where any **non agricultural materials** are used in AD plants, strict rules must be complied with, to ensure no contaminants are spread on farm land or enter the food supply.
- Establish a fair, equitable and **independent pricing mechanism to ensure a sustainable feedstock price** for farmers who wish to supply AD plants.
- **All taxation rules, reliefs and exemptions that currently apply to agriculture must continue for farmers involved in AD.**
- To support more circular based agricultural practices, it must be ensured that **digestate** from AD plants is reclassified under the Nitrates Directive and as outlined in the 2020 JRC report¹⁸ to ensure it **does not count towards a farms organic Nitrogen load.**
- Digestate from AD plants to be **eligible for spreading on Organic farmland.**
- At all times **grass and other animal feed products must be prioritised for animals.** If at any time there is potential of animal welfare issues from a shortage of fodder in the country then produce that can be fed to animals must be diverted from AD plants for use as feed for animals.
- Ensure a streamlined system is in place for the importation of animal manures and slurries and the exportation of digestate from AD plants. If built on farm these imports and exports must be **treated separately when assessing those farms organic load from its farming enterprise.**
- **Review of Animal By Product Regulation on requirements re pasteurisation.** Where only agricultural feedstocks are supplied to an AD facility there should be no requirement for pasteurisation.

Agri-Environment Schemes

Farmers are fully committed to improving sustainability of their farming enterprises, contributing to the enhancement of the environment along with maintaining the economic vibrancy and amenity value of the countryside and rural Ireland.

This is demonstrated by the phenomenal demand among farmers for the new Agri Climate Rural Environment Scheme (ACRES) – the successor of GLAS, REAP and some EIP's – where close on 55,000 farmers applied for an allocated 50,000 participants, and the fact that 97% of BISS applicants also committed to undertake additional eco-scheme actions.

Implementation of ACRES was however nothing short of a mess, particularly for farmers operating in ACRES Co-

Operation areas, whose payments were repeatedly delayed. This is completely unacceptable. Farmers cannot be left without an agri-environment scheme payment, not only because it constrains environmental ambition, but it also poses a real threat to farm incomes.

IFA propose:

- All farmers engaged in ACRES must be paid without delay. There must be full transparency and a comprehensive breakdown of payments provided; alongside opportunity for farmers, through applications for Non-Productive Investments and Landscape Actions, to fully recoup available funds as soon as possible, with same, paid in advance, to avoid further financial burdens on farmers following delayed/no payments in 2023.
- Maximum flexibility must be afforded, and no penalty applied, to farmers who, because of supply constraints nationally and/or weather challenges, are unable to fulfil contracted scheme requirements – e.g. native hedging; trees, fencing etc.
- All farmers (incl young farmers and new entrants post 2022) interested in an agri-environmental scheme must be accommodated. Farmers cannot be left without an agri-environmental scheme for the remaining term of the existing CAP programme.
- Unless to the advantage of the farmer, individual terms/ qualifications must hold true for at least the term of the new CAP programme. There can be no downward revision or pro-rata reduction in either payment or maximum eligible area within individual measures of future iterations of ACRES.

A Level Playing Field must apply – EU Trade Policy

As the EU is the largest exporter of agricultural products, European farmers as a whole benefit greatly from trade. However, the EU has undermined the incomes of EU farmers by continuing to pursue trade deals that facilitate access to the EU market of product that is not produced at the standards of environmental, animal welfare, animal health, traceability and substance use that all EU farmers are compelled to adhere to. Trade deals such as Mercosur, Australia and New Zealand must not provide additional access to the EU market for beef and sheep meat.

A recent Joint Research Service of the European Commission Cumulative impact study¹⁹ shows limited direct extra benefits for farmers from upcoming trade agreements, yet reinforces the concerns for sensitive sectors in the EU (beef, sheep meat, poultry, sugar, and rice), with Mercosur countries the key beneficiary, often at the expense of other trading partners. The study also the supported growing concern

18 <https://publications.jrc.ec.europa.eu/repository/handle/JRC121636>

19 https://datam.jrc.ec.europa.eu/datam/mashup/FTA_2024/index.html

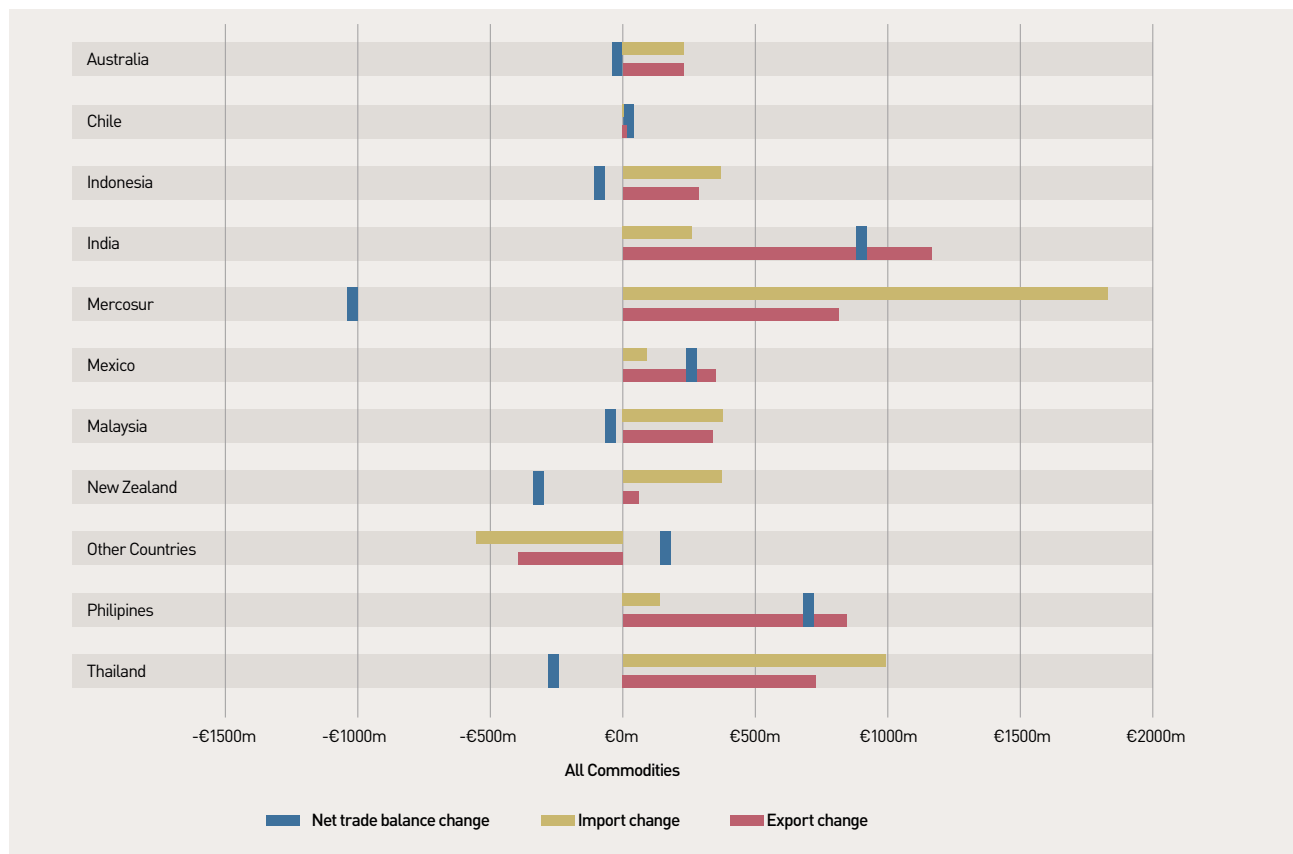
with regard to the impact of UK's new trade agenda, wherein in addition to increasingly losing market access to the UK market for many of our products, the EU will also most likely witness an increase in UK exports, of already sensitive commodities, such as beef and sheep meat.

Careful consideration must also be afforded to the design of the next Ukraine Autonomous Trade Measures to preserve EU unity and the integrity of the EU Single Market. A workable compromise and constructive solution to maintain trade flows is needed, all the time protecting EU producers, helping Ukrainian producers to diversify their exports, re-establish old trading routes and limit their dependency to the EU market.

IFA propose:

- The EU must not agree any trade deal which:
 - further compromises the viability of EU agriculture sectors.
 - sets a double standard in the market and undermines the quality and standards of EU food.
- Trade agreements must include a sustainability requirement, the implementation must be monitored, and the sustainability work done recognised to ensure reciprocity in farm production standards and a level playing field to ensure fair trade.

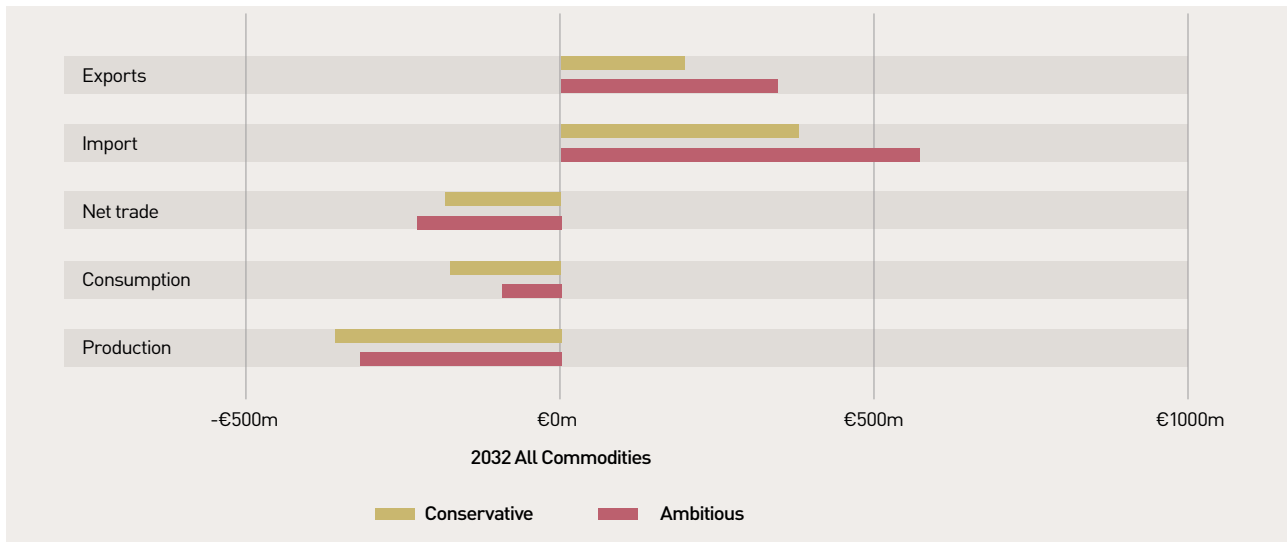
Figure 16: Change in EU trade of agri-food products - Ambitious compared to the Baseline in 2032



(Source: European Commission, 2024)



Figure 17: Change in EU market balance. Absolute change vs baseline (.000 tonnes). 2032 Beef meat / sheep meat.



(Source: European Commission, 2024)

Note:

'Ambitious + UK' scenario takes into account the five concluded free trade agreements as per the negotiated outcome, and makes the hypothesis of full tariff liberalisation for 98.5% of HS 6-digit lines, and a partial tariff cut of 50% for the other lines (sensitive products), for all considered trade agreements and symmetrically for both the EU and the relevant trade partners, for the seven not concluded agreements. It is compared against the Baseline, which is what would happen in 2032 with still the trade agreements in place in 2020.

'Conservative + UK' scenario takes into account the five concluded free trade agreements as per the negotiated outcome, and makes the hypothesis of full tariff liberalisation for 97% of HS 6-digit lines, and a partial tariff cut of 25% for the other lines (sensitive products), for all considered trade agreements and symmetrically for both the EU and the relevant trade partners, for the seven not concluded agreements. It is compared against the Baseline, which is what would happen in 2032 with still the trade agreements in place in 2020.

Animal Welfare

EU welfare standards are already among the highest standards globally. The unique primarily grass based production systems and temperate climate combined with the extensive nature of most farms in Ireland must be recognised and reflected in Animal Welfare regulations. Any changes to the current animal welfare regulation need to take into account the financial investments which may be required by farmers to adhere to the requirements, and indeed those undertaken in recent times to comply with existing regulations. Investments in animal housing have dramatic effects on the economics of farm activity and strict reciprocity clauses must be put in place so as not to distort the competitiveness of EU producers relative to 3rd country importers who are often operating at lower animal welfare and environmental standards. No imports of lower standards should be allowed into the EU to undermine the commitment our farmers have made.

Furthermore, the market will not cover the costs of implementing these changes so farmers must be funded to make these changes. It is imperative that we do not overregulate and result in driving our cost base up which would make us uncompetitive in comparison to third countries.

Animal Health

The EU must do more in financially supporting member states and farmers implementing disease control and eradication measures. The EU Veterinary Fund must be increased and support all diseases that have a trade access

implication for member states at rates appropriate to the costs associated with implementing the required controls/ measures to maintain trade access and reduce/eradicate the disease in the member state or region.

Animal Health and Welfare legislation and co-financing rules for National Veterinary Programmes

Ireland currently operates to the highest standards in the world for animal health and welfare, facilitated by the small-scale grazed grass production systems which typifies our farm structures. These systems are too often ignored and undermined in the simplistic one size fits all approach at EU level in developing legislation to address singular focus issues that are frequently lacking in scientific evidence, rather framed by populist unverified opinion.

Irish farmers have made enormous direct and indirect investments in raising the health status of the national herd through choice but also necessity in order to continue to access the single market which is a vital outlet for our produce. Ireland's role in providing a trusted, safe, and secure source for food for EU citizens must be recognised and supported. The costs of compliance with and implementation of the disease control/eradication programmes cannot continue to rest solely with Irish farmers.



IFA propose:

- The standards and production systems dominant in Ireland must be better recognised in EU Animal Welfare legislation. Irish farmers continue to be frustrated by the one size fits all simplistic approach that prevails at EU level when developing policy in this area which has been framed with indoor or very intensive production systems in mind. Our MEPs must have a louder voice in ensuring our farmers and our world class systems are not negatively impacted on.
- All animal welfare legislation must be based on the most up to date scientific advice and findings specific to the actual production systems that prevail in each member state.
- Disease Eradication/control programmes minimise the impact on trade between member states and facilitate and recognise eradication/control programme strategies that are implemented reflecting the challenges and production systems of individual member state.
- The EU should ensure farmers and member states are fairly and reasonably recompensed for costs incurred for programmes that are required to maintain access to the single market.

Live Animal Transport

The unique island status of Ireland cannot be an impediment to Irish animals accessing the single market. Animal transport regulations must recognise the fundamental principle of ensuring all member states have equal unfettered access to the single market and be consistent with the trading terms outlined in the Functioning Treaty of the EU which states that no unfair trading embargos cans be placed on individual member states.

Strong commercial markets exist for quality Irish live cattle and calves, in countries such as Spain, Italy, the Netherlands and Poland. Carried out in optimum animal welfare conditions and under strict regulatory supervision, live exports are a crucial means to provide price competition for Irish livestock. This is vital in light of the severe income crisis currently affecting Irish farmers, heightened further by Brexit.

Calf exports depend critically on the rotation and frequency of sailings by the ferry companies and capacity in the control point lairages in France (Cherbourg) for onward export to final destinations. Animal transport policy requirements must take an accurate account of the time taken for calves to reach their export destinations and not place inhibitory restrictions on travel times that undermine the economic integrity of the export market.

Calves are more immunologically robust at 2-3 weeks compared to 5 weeks of age and Irish research on animal transport has displayed this. The age allowable for calves for transport must take an accurate account of the immunological evidence and scientific research conducted to date on the age best suited for transport.

An electrolyte feed as an alternative to milk replacers during transport must be considered due to inconsistencies in the composition of different milk replacers. Nutritional upsets in calves will increase if only protein-based feeds are used in transport.

Ireland is a leader of best practice in terms of animal transport and has implemented both the current Regulation 1/2005 and additional measures beyond the current legislation to ensure good animal welfare during transport. Consideration of this must be given in any further revisions which could cause a disproportionate economic burden to Irish farmers.

IFA propose:

- The EU needs to recognise our island status in travel requirements, with no further restrictions on the live export trade and guarantee full access to the European Single Market.
- The EU needs to maintain current provisions for the export of live animals to ensure competition in the marketplace.
- The EU needs to protect existing supply routes without additional administrative or bureaucratic obstacles.
- The EU needs to support stakeholders to increase the ferry and lairage capacity for live exports, particularly for calves, without compromising animal welfare standards.
- The EU needs to support EU and diplomatic initiatives to get the international live export trade operating at capacity, to countries such as Turkey, Libya, Egypt and Algeria.

Access to Finance

It is essential to ensure continued availability of low-cost finance such as SBCI lending. It must be ensured that such funding is available to all farmers to enable them make their businesses more sustainable from both an environmental and/or a financial perspective. As the accountability requirements of the financial sector increase, funding opportunities for agriculture must be secured.

Fertiliser

Removal of anti-dumping levy on fertiliser as applied by the USA in 2022 to reduce prices for farmers; reduction in duties and implementation of an insurance scheme to protect farmers against spikes in prices such as in 2022 and 2023.

Seed Potato

A temporary seed potato derogation must be allowed between Ireland and the UK until the sector is robust in Ireland to cater for its domestic requirements. Additional funding must continue to support existing seed potato growers to expand.

Carbon Border Adjustment Mechanism

The EU's Carbon Border Adjustment Mechanism (CBAM) must be kept under continuous review to ensure it is not placing extra costs on food production within the EU.

Data / Administrative burdens

Digitalisation must reduce the administrative burden on farmers. As the use of data increases in all areas of business, attention must be paid to its fair ownership. Information controlled in production as well as in environmental work on farms must be controlled and owned by the primary producer.

The expansion of corporate sustainability reporting imposes an increasing administrative burden on primary production and SMEs, which needs to be alleviated through legislative reliefs and digitization. In addition, reporting requirements must not adversely affect the negotiating position of farmers on world markets.

Plant Protection Products

The EU re-registration process for licencing plant protection products has resulted in tillage/ horticulture farmers losing a number of key products. Other key active ingredients are also under review with little evidence of new actives entering the market to compensate for the loss of key plant protection products which play an imperative role in sustaining the economics of tillage and horticulture farms.

IFA propose:

- Currently available active ingredients must be re-authorized for use.
- Irish and EU growers require a level playing field whereby they are not compelled to compete with imported grains and other crops produced under environmental and regulatory controls which fall below EU standards.
- The Government must ensure that the EU applies parity of treatment in licencing products with the introduction of an equivalence in standards.
- Any alternative pesticides which are fast tracked through the regulatory framework must be trialed for on farm efficacy in comparison to traditional chemical control so as not to further hinder the economics of crop production.

Generational renewal

The CAP must ensure young farmers are attracted into the sector through tailored tax incentives, policy instruments and farm schemes.

Ireland and Europe have 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.

Agriculture is a low margin, highly capital-intensive business with the primary asset, land, requiring large amounts of investment. Various taxation reliefs, available nationally, recognise the high prices of agricultural land and its associated low-margin return, and must be maintained. These must be preserved and retained for active/genuine farmers to maintain their integrity as targeted incentives for farmers.

However, Irish and EU farming involve an ever-aging demographic, with a distinct lack of youth entering the industry over the past number of years. In Ireland, there are currently, close on five times more farmers aged close to the conventional pension age (i.e. >65yrs) than there are farmers aged below 35 years of age.

Generational renewal is complex, but it is key for the future social, economic and environmental sustainability of rural areas, EU food security and rural landscape preservation, not to mention the future of agriculture, including for the diversity of sustainable farming systems and traditional family farming models.

To be successful, the needs of both the younger and older generations need to be better acknowledged and supported.

Specific barriers for the potential successor include price and availability of land; access to credit; low margins; administrative burdens and image of the sector. For the farmer stepping aside, the lack of income security; low pensions etc can delay the transfer of land.

IFA propose:

- An improved funding framework must also include expanding the use of digitalisation and new technologies, reducing bureaucracy in the application process and increasing the motivation of young and female entrepreneurs to start farming.
- Strong support for committed young farmers to include: preferential national reserve, top up payments (BISS; TAMs etc), partnership supports and mainstreaming of the land mobility service.
- The introduction of a retirement scheme to encourage transfer of farms
- Taxation policy to incentivise and support young trained farmers.
- Entitlement transfer system that favours active farmers and committed new entrants.
- Removal of the €70,000 limit placed on young trained farmers under Article 18 EU Commission Regulation (EU) No. 702/2014.



Forgotten Farmer Scheme

Aligned with above, 'Forgotten Farmers' are a combination of farmers who lost out following the removal of young farmer supports (Installation Aid) in 2008 due to cuts in public expenditure by the Government following the last recession.

They were then unable to qualify for the young farmers supports introduced under CAP 2015 because in many cases they had been farming for five years or more.

The current Programme for Government commits to resolving the issue of support for the category of farmers known as 'Forgotten Farmers', however to date nothing has materialised.

IFA define a Forgotten Farmer (Old Young Farmer) as the following:

- A Basic Payment Scheme recipient before 1st January 2015;
- Was ineligible for the Young Farmer's Installation Scheme under the RDP 2007-2013 because they started farming after 14th October 2008, the date which applications to the scheme were suspended (the scheme provided a grant to young farmers under 35 setting-up for the first time in farming);

- Was ineligible for the Young Farmer's Scheme under CAP 2014-2020 because they had set up their holding more than five years preceding the first submission of Basic Payment Scheme (successful applicants then received 25% of the national average payment per hectare multiplied by your number of eligible hectares up to a maximum of 50 if they were aged no more than 40 years of age at any time during the calendar year in which they first submit an application under the BPS).

IFA propose:

- A Forgotten Farmer scheme be introduced, with all farmers meeting the above parameters eligible to apply for a one-off payment, equivalent to what they would have received under the Installation Aid scheme, together with the following and/or equivalent schemes:
 - Complementary Income Support for Young Farmers;
 - National Reserve;
 - TAMS/Young Farmers' Capital Investment Scheme (Access to increased level of 60% grant aid).



SECTION 5:

Farmers want to farm and produce food in a sustainable way

As it stands, economic burdens and bureaucracy are strangling farmers across Ireland and the EU, made worse by the threat and potential of a plethora of further EU initiated reductionist policies on existing and future farm operations.

Farmers need a period of predictability and stability in the years ahead. It is imperative that our elected representatives ensure new EU strategies and legislative projects are based on science and high-quality impact assessments at Member State level, with maximum subsidiarity provided toward its implementation.

There also needs to be better acknowledgment among our elected representatives that individually, the impact and demands of these policies are damaging to the economic viability of farms (most particularly the small scale and designated farms), but collectively they are disproportionate and will force an amplification of the exodus trend witnessed in recent years. Enough is enough.

Designated Area Payments

Payments through the National Parks and Wildlife Service (NPWS) for land under Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) through the Farm Plan Scheme helps meet the costs of restrictions imposed and provides 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.

However, additional resources need to be afforded to the Farm Plan scheme, with increased payment rates offered to reflect the additional costs and burdens on farmers, and flexibility provided that it can operate alongside other agri-environmental schemes where additional land is held. In addition, there needs to be a full review of the internal operating dynamic surrounding designations, compensation, and applications for actions requiring consent (ARCs), because the existing is not fit for purpose. Farmers need permanent payments for permanent designations.

In addition, those farming within Natura 2000 sites cannot be over burdened with further requirements to comply with EU legislation. Agricultural activity in these areas must be better supported and allowed to continue.

IFA propose:

- In consultation with IFA, a full review of the internal operating dynamic surrounding designations, compensation and applications for ARC's is required because the existing is not fit for purpose.
- No further restrictions should apply to designated lands. Instead increased support (advisory; financial etc) should be provided and agricultural activity allowed to continue.
- The Farm Plan scheme should be reopened and operate alongside other agri-environmental schemes, to include all farmers who are farming on land which is designated
- Additional funding should be allocated to the NPWS farm plan scheme to pay farmers where, due to designation of land, restrictions are imposed on farming and lands significantly devalued.
- All designated area payments must be independent of CAP funds with payment period matching, in full, the designation period.
- A new 'Farming for Habitat and Farming for Species' payment needs to be introduced to maximise environmental gain and compensate farmers who suffered a loss in income when the Hen Harrier; Pearl Mussel; Burren Schemes ended.

Nitrates Directive/ Derogation

Ireland, currently, is permitted to have this derogation until 2025. However, after a mid-term review in 2023 a reduced maximum stocking rate of 220kgs per hectare (from 250kg N/ha) has come into effect from 1st Jan 2024 for most of the 6,727 farmers in derogation.

The reason the Nitrates Derogation dropped to 220kg N/ha relates to water quality, and a clause within the European Commission Implementing Decision (EU) 2022/696 (which granted Ireland's Nitrates Derogation) that any area that failed the two-year review of water quality in 2023 was obliged to move to a reduced derogation limit of 220 kg N/ha from January 2024.

It should be noted that more recent NAP in Ireland have been much more ambitious than earlier versions, with farmers required to adhere to more than 30 additional measures on their farm to protect water quality. The 2-year review window was simply too narrow to take effect. Research²⁰ suggests it

20 A.R. Melland et al. (2018). Effects of agricultural land management changes on surface water quality: A review of meso-scale catchment research. Environmental Science and Policy. Volume 84. Retrieved from: <https://www.sciencedirect.com/science/article/abs/pii/S1462901117309784?via%3Dihub>.



could take between 4 and 20 years for mitigation measure to have a positive impact on surface water quality.

The constant review of the NAP every 2 years also provides no certainty to farmers.

Farmers are now reluctant to invest in measures to protect water quality as they are uncertain if they will be able to meet the financial commitment should further erosion of the derogation occur.

The imposition of a lower organic N limit per ha (if the derogation is not secured) could move farmers away from pasture-based systems to a higher input system (more bought in feed), which has been shown to pose a higher risk to the environment.

IFA estimate that the reduction to 220kg organic nitrogen will have a cumulative sector cost of up to €60m per annum, and should a complete loss of the nitrates derogation occur, it would reduce dairy income for impacted farmers by c.€23,000/annum (hitting the viability of small and medium sized farms in particular); result in over 1,100 job losses and a potential economic impact of over €1bn/annum when all direct and indirect factors are accounted for.

IFA propose:

- Ireland's nitrates derogation must be maintained or it would impact the viability of thousands of farmers (across all sectors) and have a huge knock-on social impact on rural Ireland.
- Based on our understanding of the complexity of factors that impact water quality, we advocate for targeted and tailored measures to mitigate potential nutrient loss from farms to our catchments rather than blunt blanket instruments.
- The review of the Nitrates Directive and the granting of derogations under the directive must recognise and respect the position of member states who rely on the Nitrates Derogation to maintain grass based sustainable farming systems. The facility of a nitrates derogation, granted for a longer period, should be pursued in order to affirm the viability of sustainable grass-based production systems which offer multiple environmental and animal welfare benefits. Any reduction in the derogation will in fact be counterproductive in terms of achieving various environmental and sustainability objectives.

Nature Restoration Law

One of the commitments in the EU Biodiversity Strategy is to put forward a proposal for legally binding EU nature restoration targets. The proposed Nature Restoration Law, which seeks to restore ecosystems, habitats and species across the EU's land and sea areas, aims to fulfil this commitment, however it has been hugely controversial since first proposed by the European Commission in June 2022.

Each Member State must develop a draft National Restoration Plan within 24 months of the Regulation coming into force, specifying how targets are to be delivered (by 2030, 2040 and 2050) for each the ecosystems in Articles 4-10.

The reintroduction of Article 9 relating to agricultural ecosystems following trilogue negotiations does not support

the original mandate of the Parliament to remove it. This is one of a number of examples where the Parliament position is not upheld within the trilogue negotiations. In the next Parliament it will be important that Parliament negotiators communicate strongly to the co-legislators the impact of these types of policy decisions.

It is important too that those farming within Natura 2000 sites who will have prioritisation for restoration measures till 2030 are not over burdened with the requirements to restore habitats and that agricultural activity in these areas, specifically those referenced in Article 4 of the document, is allowed to continue.

Financing of the law must remain external to the Common Agricultural Policy and restoration measures should be seen as economically attractive to farmers in order to incentivise uptake. A focus on the next Multi Financial Framework within the next Parliament is essential to allocating funding more comprehensively to farmers.

The establishment of Nature Restoration Plans which will be ratified by the Commission should be conducted with the highest level of farmer consultation with measures of a pragmatic nature that align with current agricultural activity. The measures should have no impact on Ireland's food production autonomy and the economic role it has in supporting rural areas.

IFA propose:

- Similar to the Sustainable Use of Pesticides Directive, the Nature Restoration Law should be suspended pending full 'bottom-up' review and re-engagement with key stakeholders; the completion of a full impact assessment by Member State; and sourcing of sufficient long-term funding model (independent of CAP), including therein the establishment of carbon trading mechanism.
- Maximum flexibility must apply at Member State level, with no further restrictions applied to Natura 2000 sites, and any restoration measure implemented only where voluntary in nature and following commercial assessment on the part of the farmer.
- It is imperative ongoing maintenance activities (e.g. existing drainage networks; active pumping etc), including the installation of replacement and additional drains where relevant, are permitted to preserve current land use and drainage systems, and that any introduced measure does not economically disadvantage the farm operation.

Industrial Emissions Directive (IED)

The Industrial Emissions Directive aims to achieve a high level of protection of human health and the environment by reducing harmful industrial emissions across the EU. Somewhat illogical however, it includes Agriculture within its remit, and will have profound and detrimental implications on pig and poultry operations (plus cattle farms if re-introduced - pending a review clause contained in the directive for 2026); risking EU self-sufficiency and the livelihoods of rural and marginal communities; in addition to our competitiveness on international markets.

The inclusion of small-scale pig and poultry farms as well as the 2026 scheduled review to potentially incorporate cattle into the scope of the IED is a highly burdensome financial punishment to family run Irish farms which do not belong within the scope of the directive that controls emissions from cement, glass and chemical factories.

Pigs and poultry account for a very small amount of total Irish agricultural emissions and so their inclusion within the scope of this directive makes next to no difference in overall emission reductions. The financial implications for these farms however are highly severe with many farms choosing to exit the industry rather than make high capital investment costs to comply with the regulation.

The revision of the directive also calls for a greater level of public and legal scrutiny on the licensing process for farmers wishing to obtain an IED license. It is important that only those with a direct vested interest in planning procedures have a say in whether farms can obtain licenses.

IFA propose:

- The status quo should apply and no additional farm operations, across any sector, should be impacted by the Industrial Emissions Directive
- Given the outcome of the Plenary Vote:
 - The highest level of stakeholder consultation must be carried out when deciding what BATs²¹ are applicable to smaller farms which fall within the remit of the revised Directive. Excessive BAT requirements will result in smaller farms exiting the pig and poultry sector due to disproportionate capital investments.
 - The potential inclusion of cattle within the scope of the directive following a 2026 review is not compatible with Ireland's grass based system or its emissions profile.

Soil Monitoring and Resilience

Under the proposed new soil health law, likely carried forward to be EU Parliament, Member States would have to monitor and assess the health of all soils in their territory, and required to improve critically degraded soils to degraded soils within ten years; degraded soils to moderate ecological status within six years; and moderate ecological status to good ecological status within six years. In addition, Member States will have to assess and clean-up sites with contaminated soil (list developed within four years after the entry into force of the soil monitoring law) that present unacceptable risks to human health and the environment. Costs would be borne by those responsible for the contamination.

IFA propose:

- The proposed principles under the soil health law must include safeguards that ensure the law does not negatively impact farmers livelihoods in the short-term by increasing operational costs and reducing productivity. These safeguards are not included in current proposals.
- The proposed law should not place additional financial and administrative burden onto farmers which may have no direct benefit to soil management and soil health.
- Any reporting body nominated to conduct soil testing must have a full understanding of the nuances related to agricultural soils. Data collected from this exercise must not be used in a manner that restricts the productivity of farms. Any soil management principles recommended by the law should remain voluntary and not above the requirements outlined in the CAP or other Agri-Environmental policies to avoid double regulation.

Carbon Removals Framework

The framework has potential to offer farmers new opportunities to diversify and generate additional income to improve the long-term resilience of their farm, while delivering on Europe's climate ambition. However, for such incentives to be effective they need to be functional and the payment sufficient to drive substantial practice changes on farms.

The framework needs to ensure that the definition for additionality does not create an unfair penalty for farmers who had been innovative and forward-thinking enough to adopt beneficial practices in advance of the framework being introduced. Acknowledgement of the work done by farmers to reduce emissions and existing carbon reservoirs is important and should be certified.

Agriculture is in a unique position to offer co-benefits alongside carbon removals i.e. biodiversity benefits, water quality improvements and erosion reductions. These co-benefits must be factored into the additionality component of carbon certifications and provide an economic premium for farmers choosing to participate in carbon certification, given their overarching societal benefits.

The requirements of carbon farming schemes should be closely aligned with the CAP and should not require farmers to make significant and annual financial investments before any remuneration can be received. As farmers uptake carbon mitigation measures, they should be appropriately compensated for the efforts.

There must be an acknowledgement of the sometimes more transient nature of agricultural carbon compared to artificial air capture and the allowance for the farmer to make agronomically informed decisions that may result in carbon



fluctuations. Liability mechanisms for carbon loss should not be discouraging for farmers and penalty systems cannot be financially burdensome.

IFA propose:

- That the definition of additionality must recognise the early efforts of farmers already engaged in carbon removal activities and existing carbon reservoirs on farms.
- It must be designed to benefit farmers rather than agribusinesses, large corporations and/or offset buyers. There must be transparency in relation to the pricing structures and traceability to ensure that farmers are being fairly paid to undertake the measures versus the carbon price paid for the credit generated.
- Farmers should be eligible for a carbon payment even if the measure is supported under CAP, particularly considering the carbon sequestered goes beyond the lifespan of the CAP programme.

Agricultural Emissions Trading System (ETS)

For most on-farm techniques and practices of carbon sequestration, the permanence of any carbon sequestered is extremely difficult to guarantee, and therefore presents an immediate challenge for integration into the ETS.

Embedding legal requirements in protocols or methodologies that aim at achieving permanence, is very complicated and ignores the reality of farming decisions and environmental factors like differing soil types and land uses.

The potential inclusion of agriculture within the ETS has the capacity to distort input prices for farmers, drastically effect production choices, consolidate agricultural holdings into larger enterprises and add additional inflationary dynamics to food prices.

In addition, the potential threat of corporate bodies taking an interest in agricultural land as a mechanism to reduce the carbon emissions could pose a risk to food security and food production.

Sustainable Food Systems

The role of meat and dairy within EU diets must be affirmed and the positive role that animals play in ecosystem service in tandem with food provision.

Promotion funding and policy is becoming increasingly restrictive for meat and dairy products in Europe. This has very direct implications on the position of agriculture within the rural economy, given its fiscal importance, and should be addressed.

New Genomic Techniques (NGT)

The UK Precision Breeding Bill²² has been formalised by the British Government and allows for unlimited genetics changes to be made to plants using CRISPR-CAS9 modifications. Ireland has a historic dependence on the UK for crop varieties and there is currently no cereal breeding occurring in Ireland. In the future Ireland may have to seek varieties from mainland Europe which would not be fully compatible with the Irish climate, thus placing the Irish tillage sector at a competitive disadvantage relative to other member states and on the wider global grain commodity market.

Supporting the Parliament and Council to reach a decision on NGTs is imperative to ensure that Ireland is not left on the competitive backfoot in terms of crop production relative to other international producers who have historically utilised these modern technologies.

IFA propose:

- Decisions to restrict the use of NGT must be based on comprehensive scientific evidence.
- All parties keep an open mind on decisions surrounding the development of NGT.

Forestry

The EU Forestry Strategy, which is a flagship initiative of the European Green Deal, aims to protect, restore and enlarge the EU's forests to combat climate change, reverse biodiversity loss and ensure resilient and multifunctional forest ecosystems. It recognises the central and multifunctional role of forests, and the entire forest-based value chain in achieving a sustainable and climate neutral economy by 2050 and preserving lively and prosperous rural areas.

Ireland has the third lowest forest cover in the EU at 11.6% compared with a European of 39%. Ireland's Climate Action Plan 2024 set a target to increase the annual afforestation rates to 8,000ha per annum, to deliver an additional 28,000 ha of afforestation during the first carbon budget period (2025). While the long-term strategy is to increase the forest area from 11.6% to 18% by 2050, this equates to an additional 500,000 ha of new forests. In 2023, just 1,600 ha was planted, 80% below the afforestation target of 8,000 ha.

A major barrier to achieving the planting targets is the replanting obligation, which is enshrined in the Forestry Act 2014. This not only impacts immediate land use decisions but also has long-term implications for future generations locking land into forestry in perpetuity. If the planting targets are to be achieved the replanting obligation needs to be reviewed and relaxed further.

22 <https://bills.parliament.uk/bills/3167>

New Forestry Programme

In August 2023, the European Commission granted State Aid approval to the afforestation scheme under Ireland's Forestry Programme 2023 – 2027. A condition of approval was that:

- i organo-mineral soil with a peat depth of greater than 30 cm are no longer eligible under the afforestation scheme. In the previous programme peat depth of greater than 50 cm were excluded. This change in the definition of the peat has significantly reduced the land available to forestry, and reduced the prospect of Ireland meeting afforestation targets. Thin peat soils below the 50cm threshold are suitable for tree planting, and should be permitted particularly for native woodlands. Native woodlands are a natural part of a peatland ecosystem mosaic.
- ii mandatory broadleaf area increased to 20%. This was 15% under the previous programme

IFA propose:

- The condition on organo-mineral soils should be reviewed so that peat depth of less than or equal to 50 cm, subject to appropriate assessment screening, are eligible under afforestation scheme.
- The mandatory broadleaf area requirement should be reduced to 15% as per the previous programme.

Amendment to State aid guidelines to support farmers with ash dieback

The guidelines for State Aid in the agricultural and forestry sectors and in rural areas (2022/C 485/01)²³ prevent Member States from providing compensation and annual premium per hectare on forests that need to be restored as a result of damage to forests from plant pests and infestation by invasive alien species.

Farmers whose ash woodlands have been devastated by ash dieback disease receive no compensation for loss of timber earnings or for the income foregone as a result of the disease. Farmers with forestry who are affected by disease are looking for equity and fairness with agriculture activities under State Aid guidelines. The policy deficiency means that the costs of outbreaks are borne almost entirely by producers who cannot receive compensation from the Government. This needs to be amended.

IFA propose:

- Under 2.1.3. *Aid for the prevention and restoration of damage to forests* IFA is seeking the inclusion of aid in the form of compensation and annual premium per hectare may be granted to cover the costs of income foregone and maintenance, including early and late cleanings, for a maximum period determined by the Member State.

Plant Health Regulation

Plant disease outbreaks are increasing and farmers are growing increasingly concerned about the risks posed by the importation of plants and wood and wood products into Ireland. For example, spruce bark beetles have destroyed millions of hectares of spruce forests across Europe. Plant disease can be seriously damaging to the agricultural and forestry sector as well as our traditional landscapes.

The EU Plant Health Law which came into force in December 2019, provides early-stage measures to prevent pests from entering the EU, or to eradicate them immediately if found present, thus ensuring a uniform level of phytosanitary protection within the EU territory. The legislation has been of major importance for the protection of the agriculture, forestry, the landscape and the environment.

The Commission undertook a review of the regulation in 2021 to report on the enforcement and effectiveness of the import measures, and the experience gained by operators from the extension of the plant passport to all plants for planting.

The report also identified areas for further discussion to enhance the effectiveness and practical implementation of the rules for plant health but also for official controls, including the need for autonomous acts for adopting special import requirements.

IFA propose:

- The Plant Health Regulation is scheduled for revision as part of the Commission work programme in 2024. It is vital that greater autonomy is given to Member States to protect plant health which should include the ability to introduce temporary prohibitions of high-risk plants, wood and/or wood products and/or to adopt the precautionary principle with regards to biosecurity.

²³ European Commission (2022). Guidelines for State aid in the agricultural and forestry sectors and in rural areas (2022/C 485/01). Retrieved from here: [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022XC1221\[01\]](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022XC1221[01]).



Producer organisations (POs)

Under the EU Commission CAP proposals there are a number of opportunities for Member States to select specific sectoral interventions in their strategic plans. These are vital for vulnerable sectors. POs provide producers with a mechanism to group supply and thereby strengthen their position in the market. There are opportunities for all sectors to be supported in this market structure.

IFA propose:

- The next CAP must continue to support POs for all sectors.
- The costs, rules, regulations and administrative burden, including reporting and inspections of POs, be simplified further to encourage uptake.
- Additional funding to support establishment and ongoing running costs is required.
- Additional protections are required against the unfair treatment of POs by buyers.
- Potato producers must qualify under the EU Fruit and Vegetable PO scheme.



SECTION 6:

Local Government Elections

Local government will play an important role in the delivery of national and EU policy. IFA will work with local government to achieve a strengthened rural economy; enhanced amenities and heritage; and a transition to a low carbon and climate resilient society.

Services for Rural Dwellers

Housing

The National Planning Framework (NPF) envisages an increase of 1 million in Ireland's population by 2040, of which half is predicted to take place outside of our main cities. The NPF target at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites, with the remainder delivered at the edge of settlements and in rural areas.

There are areas of concern regarding housing from a farmer perspective, including firstly, ones ability to secure residential planning permission in rural areas, and secondly the Residential Zoned Land Tax.

Within the long awaited 'Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities' it states that "Planning authorities should look to promote and support housing that would offer an alternative, including serviced sites, to persons who might otherwise construct rural one-off housing in the surrounding countryside in rural towns and villages".

IFA propose:

- Local Authorities must fully recognise, and not discriminate against, the need for rural housing for farmers and their family members who have an intrinsic link with the rural community.

- Development levies are punitive in some counties and should be suspended for rural dwellings (new and extensions to existing).

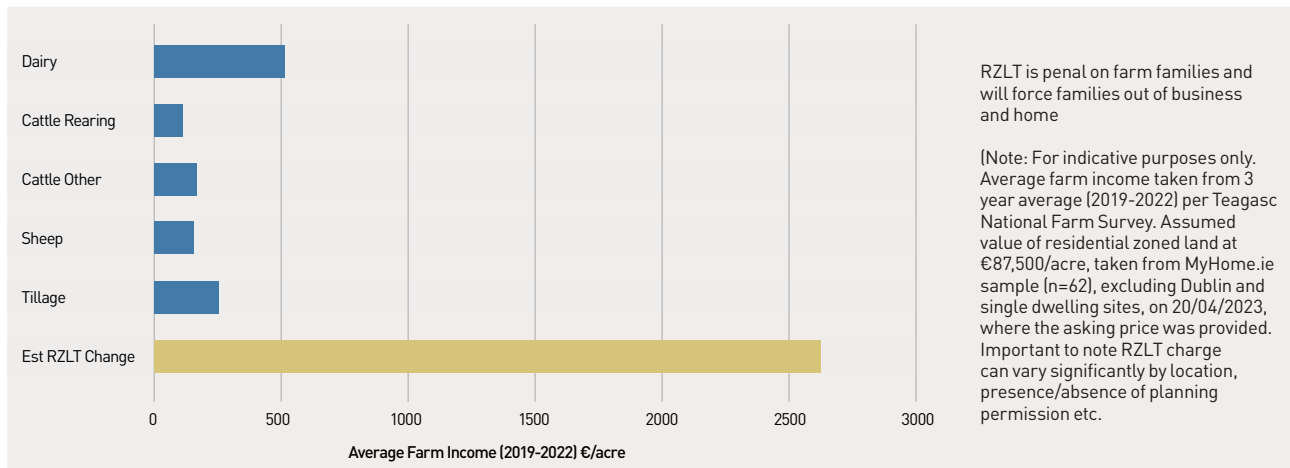
Residential Zoned Land Tax

The Residential Zoned Land Tax (RZLT) is a new tax coming into force from 2025 which seeks to increase the availability of zoned and serviced land for developmental purposes. Currently, no acknowledgement or account has been made of the fact that farmers are private land owners who want to use their land for food production. They are not speculators nor have caused the current housing problems. The 3% annual market value tax is unjust and disproportionate to its income generation capacity, and represents nothing more than a land-grab exercise.

IFA propose:

- All genuinely farmed land must be exempted from RZLT. Local Authorities must ensure only land required in the immediate future, which is fully serviced is zoned and included in maps for RZLT. Farmers challenging the RZLT maps and/or applying to Local Authorities to have their land dezoned must be accommodated without being disadvantaged.

Figure 18: Average farm income per acre vs estimated RZLT liability per acre





Education

Nearly 2,000 out of just over 3,200 of the State’s primary schools are in rural areas. Often, these schools provide a vital link to local heritage and history, help sustain rural populations, and act as a link for sports and social activity.

IFA propose:

- **Government and Local Authorities must fully support and avoid the closure of small schools, particularly if it is against the wishes of parents.**

Childcare

The provision of childcare facilities in rural areas is often challenging, sometimes due to poor availability in low density population areas, coupled with the fact that Government subsidies under the National Childcare Scheme extend only to creche places and Tusla-registered childcare providers.

IFA propose:

- **Currently available financial supports are extended to all childcare providers.**

Health

The availability of primary care services (GPs, health and social care professionals, Public Health Nursing) in local communities is essential to meet the needs of rural Ireland, and avoid excessive demands on acute hospital settings.

IFA propose:

- **The continued provision of primary care services in rural areas is paramount, requiring adequate investment and resourcing.**

The current burden of nursing home care on farm families is threatening the viability of the family farm. The needs of older people and low-income farm families need to be addressed.

IFA propose:

- **Home Care Package should be introduced under the Nursing Home Support Scheme/Fair Deal to allow older people to be cared for in their own home.**
- **A reduction of the 5-year land/business transfer clause to a maximum of 3 years to allow more farmers to benefit from the Fair Deal Scheme.**

Banking

The agri-sector needs a stable truly committed and trusted Banking sector. However, what exists today is unfortunately a much-diluted version of the past, in terms of personal relationship, competition and indeed overall service provision, with a forced transition toward digital banking and/or an increased reliance on An Post and Credit Unions to mitigate and provide regular community banking services. Closure, and/or loss of personal service in many ‘operating’ Banks, represent another dent to the social fabric of many rural towns/villages serving also a significant inconvenience, cost and financial risk to its many businesses and inhabitants. Many are now faced with the new reality of being without 24/7 access to cash with the withdrawal of ATMs; forced to travel significant distances (even across country boundaries) or wait on hold for hours on dedicated phone lines (often times passed to multiple persons) to conduct day-to-day business transactions.

IFA propose:

- **Access to farm finance and working capital is paramount for farmers across all enterprises. It is vitally important that farmers have easy access to sufficient low-cost funding to allow their businesses to trade efficiently.**
- **Ensure availability of reduced finance such as SBCI lending is continued. It must be ensured that such funding is available to all farmers to enable them make their businesses more sustainable from both an environmental and/or a financial perspective.**
- **Significant investment and added resources will be required to support An Post / Credit Unions etc in their efforts to facilitate community banking, with advances needed not only toward an improved financial offering to the SME market (and competitive nature thereof) but also significant capital investment in their infrastructure/network to facilitate more secure/private financial transitions.**

Water

The majority of farm families and rural dwellers provide and pay for their water supply either to Uisce Éireann, their group water scheme or are self-sufficient through a private water source on their property. Farmers connected to mains water supplies could be hit with higher water bills, as Uisce Éireann plan to increase water charges – both standing charges per connection and cubic meter costs - from October 2024, the end of existing 3-year transitional period. This is particularly concerning for farmers with multiple connections, such as those with fragmented farms.

Table 8: Current and Proposed Water Service Charges

Metered Tariffs	Current Water Service Charges		Proposed Water Service Charges	
	Standing Charge (€/yr)	Volumetric Charge (€/m ³)	Standing Charge (€/yr)	Volumetric Charge (€/m ³)
Band 1 Class (<1,000m ³)	43.76	1.87	83.02	2.19
Band 2 Class (1,000m ³ -19,999m ³)	113.31	1.30	218.11	1.68
Band 3 Class (20,000m ³ -249,999m ³)	1,872.98	1.21	3,708.61	1.56
Band 4 Class (250,000m ³ -2,299,999m ³)	21,771.46	1.05	41,332.17	1.38
Band 5 Class (250,000m ³ -2,299,999m ³)	-	-	295,967.72	1.27

IFA propose:

- The Commission for Regulation of Utilities change direction on the proposed tariff increases and recognise the challenges facing the sector.
- The standard charge per connection is reviewed for farmers with multiple connections and that water charges are linked to a Water Point Reference Number (WPRN) and not each individual connection.
- IFA proposed that a new Band 1 is introduced for non-domestic customers with very low water usage i.e. less than 250m³, and that the proposed volumetric water charge is fair and proportionate.
- Significant continued investment in water and waste management infrastructure and services toward improved performance and supporting implementation of national strategies in relation to public health, safety and environmental compliance.

Rural transport

The Connecting Ireland (CI) Rural Mobility Plan is the National Transport Authority's (NTA) plan to improve rural and interurban public transport services across the country. Usage on Transport For Ireland (TFI) Local Link services has seen a seven-fold increase since 2018, with more than 190 towns and villages now connected. To achieve greater accessibility to services in rural areas it is necessary to improve the frequency and reach of public transport services. This would connect isolated individuals in rural areas to their wider communities, while also creating employment opportunities.

IFA propose:

- The continued roll-out and expansion of the Local Link service, operating 12 months of the year in each local authority area.
- Ensure that public transport services in rural and regional areas are accessible to persons with disabilities and reduced mobility.
- Develop a subsidised Local Area Hackney Scheme in designated areas of rural Ireland which are too small or remote to support a full-time taxi or hackney service

Figure 19: Services Implemented in Phases 1 & 2 of the Connecting Ireland Plan




Rural roads

Over the lifetime of the National Development Plan, €2.9bn has been earmarked for the maintenance of the existing National Road network; and €5.1bn for new national roads projects until 2030. In 2024, €412m has been allocated to Local Authorities for national roads (new / early-stage development), with an additional €33m for the day-to-day maintenance of the national road network.

In addition, approximately €30 million has been allocated to the Local Improvement Scheme (LIS) in 2024 - an important support to help improve country roads and laneways in rural areas which are not always maintained by local authorities. However, the LIS funds are sometimes underspent, leading to an ongoing deterioration of these rural roads.

IFA propose:

- That Local Authorities, in collaboration with relevant Government Departments, invest in the local and regional road network to maintain roads to a proper standard and improve regional accessibility.
- Each Local Authority should publish LIS expenditure on a quarterly basis each year and also set out their LIS awareness campaign, to maximise uptake.

Recreational routes

The Programme for Government provides a commitment of €360m per annum in dedicated funding to walking and cycling. In 2024, €72m is being provided to Local Authorities to deliver c.65km of Greenway and begin delivery of the National Cycle Network (published January 2024), which identifies 3,500 km of cycling corridors around the country linking cities and towns of over 5,000 people.

IFA recognises the importance of recreational routes, such as Greenways and Blueways, in promoting agri-tourism and economic activity in rural areas. However, they also have a significant impact on farming activity and rural communities which needs to be considered, spanning privacy; safety and security; anti-social behaviour; litter; animal disease, wildlife and environmental issues.

To-date, consultation with landowners has been haphazard and, in some instances, non-existent. Landowners are the most important stakeholders in the development process. Therefore, there is an obligation on local authorities to work with the lead agency (Department of Transport) and develop a standardised approach of engagement with landowners that all local authorities must follow.

In parallel, and in line with Government Strategy for the Future Development of Greenways and the *Greenway Code of Best Practice*²⁴, greenway projects must maximise the use of public lands and minimise the impact / disruption on privately owned lands /farms.

IFA propose:

- Landowners and IFA must be consulted:
 - In advance of route selection and the publication of a defined route corridor.
 - In protecting the integrity of farm holdings and using all available public lands.
 - In developing a code of practice, which sets out the rights and entitlements of landowners.
 - In ensuring landowners are indemnified against any potential claims arising.
 - To ensure all health and safety concerns are adequately addressed.
- All efforts must be made to secure voluntary agreements with landowners. There should be no threat of the compulsory acquisition of land.
- Any losses incurred, such as exclusion from farm schemes, must be fully compensated.
- The appointment of a Project Liaison Officer by Local Authorities, to hold community clinics to address queries and concerns.

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. IFA welcomes the recent expansion of the Walks Scheme that will see the number of trails increase from 80 to 150 over the next two years. For each, there needs to be provision made for ongoing maintenance grants, but also there needs to be greater promotion and enforcement of the 'No Dogs Allowed' policy for the protection of ground nesting birds, biodiversity and farm animals.

IFA propose:

- Maintenance grants for new and existing walks must be provided.
- There needs to be greater promotion and stricter enforcement of the 'No Dogs Allowed' policy
- Any amenities or walkways within the jurisdiction of Local Authorities that are in close proximity to farm lands where animals are grazed must prohibit dogs

Broadband and Phone Coverage: availability and access

Farm families, rural dwellers and rural businesses require access to high-quality fibre broadband service and phone coverage that makes their lives better, lowers the cost of

²⁴ <https://www.gov.ie/en/publication/6b6a0-code-of-best-practice-for-national-and-regional-greenways/#:~:text=The%20Code%20provides%20information%20on,route%20selection%20and%20statutory%20processes>

doing business, and more broadly supports diversification of rural economies and jobs through digital technologies - enabling more people to continue to live and work in rural locations and encouraging others to relocate to rural areas. Government must deliver on their commitment in 'Our Rural Future' around the National Broadband Plan (NBP) for rural Ireland.

IFA propose:

- An accessible and affordable phone and fibre network that meets the speed and data usage requirements of both current and future Irish consumers.
- The immediate rollout of the network across all geographic regions, accommodating all rural premises/farms including those that are at a distance from main roads.
- The rollout plans must run as a parallel process, starting at the most rural edges of the network and working back to ensure that those most in need of the service receive it as a priority.
- The network rollout should be completed in a timely fashion and have hard 'completion time frames' with penalties.
- Invest significantly in remote working infrastructure to enable more people with live and work in rural communities, including where available the conversion of vacant properties in town centres as Remote Working Hubs.

Rural Planning and County Development Plans (CDP)

County Development Plans are an important tool supporting the implementation of national policy.

IFA propose:

- Each CDP acknowledges the importance of farming.
- The inclusion of a chapter in each CDP supporting the development of farm scale and community renewables.
- Recognition in CDPs of the need for rural housing for farmers and their family members who have an intrinsic link with the rural community.
- Each CDP waives development charges, where development is taking place due to EU or national regulations and/or involves investment that protects the environment.

- Encourage and support Local Authorities to expand the number of farmers' markets, farm shops and community-owned markets in all towns, to showcase produce from local farmers, growers, and food producers.
- Consider the needs of rural areas in the development of a new Electric Vehicle Infrastructure Strategy which will seek to ensure that charging infrastructure stays ahead of demand.

Local Authority Climate Action Plans and Public Participation Network (PPN)

PPNs are acknowledged in the Climate Action Act as key players at local level; the legislation mandates the Local Authorities to consult with the PPNs in the development of Local Authorities Climate Action Plans. The Land Use Review report (2023) shows that 78% of land is in private ownership, of which 67% is agricultural land. Therefore, it is only appropriate that farmers would be identified as one of the main community groups to be part of the Public Participation Network.

IFA propose:

- Farmers should be added to the main community groups and are represented in their own right as part of the Public Participation Network.

Planning Permission

Ireland's Climate Action and Low Carbon Development (Amendment) Act (2021) requires local authorities to prepare a Local Authority Climate Action Plan (LACAP) to meet national emission reductions targets and develop resilience to the impacts of climate change. This cannot be utilised as a mechanism to prevent or constrain planned on-farm investment requiring planning permission.

IFA propose:

- Planning process needs to be fast tracked and streamlined for flooding works and investments that enhance slurry storage on farms.
- Development levies are punitive in some counties and should be suspended for on-farm environmental investments.
- Serial objectors that are not from the local area should not have the opportunity to launch an objection on such investments.



Commercial Rates on Farm Buildings and Agricultural Land

Many Governments have prioritised agriculture and food as a major economic driver for the Irish economy. This, coupled with often limited financial return despite high-value assets involved, explains in part the large suite of relief measures currently in place to support the sector.

IFA propose:

- All exemptions applying to farm buildings in the Valuation Act 2001 and the 'relevant property not rateable' list must be maintained and expanded to recognise the diversification of farm enterprises.

Local Authorities Farm Inspection Protocol

Local Authorities are now required to carry out over 4,500 environmental inspections on farms. The 'Farmers' Charter of Rights' is a very important document for both farmers and the Minister for Agriculture, setting out effectively how DAFM will interact, engage with and conduct on-farm inspections. It offers greater transparency and accountability and serves to better ensure consistency of treatment and that farmers rights and fairness are at its core. However, the Farmers' Charter of Rights does not extend to include the actions or activities of Local Authorities, despite Local Authority staff / contracted personnel undertaking farm inspections per the Local Government Water Pollution Act and the GAP²⁵ regulations.

IFA propose:

- In consultation with key stakeholders, a Local Authorities Farm Inspection Protocol should be agreed with IFA to better ensure farmers, and Local Authority staff, are treated fairly, with respect, dignity, professionalism and efficiency at all times.

Litter

Farm families and rural dwellers play a vital role in keeping their communities litter free. However, this excellent work continues to be challenged by the practice of fly-tipping, littering and serial dumping.

IFA propose:

- Amending litter legislation, which currently places the responsibility on farmers and homeowners to clean up reckless dumping of others.

- An Garda Síochána and the Data Protection Commissioner resolve existing issues, which prevent data-sharing, where CCTV cameras are used to deter criminal activity and illegal dumping in rural areas.
- Introduce by-laws to strengthen penalties imposed on offenders and serial dumpers.
- County Councils provide civic amenity sites, including skips on the outskirts of all towns and villages where citizens can safely dispose of rubbish.

Dog Control

IFA first launched the 'No Dogs Allowed' campaign in 2021 and despite continuous appeals for action, both the Government and Local Authorities have failed to address the issue. The problem of dogs attacking sheep flocks remains all too common, inflicting horrific damage from an animal welfare and economic perspective.

Under the Control of Dogs Act 1986, as amended by the Control of Dogs (Amendment) Act 1992, local authorities are responsible for the control of dogs. They have the power to appoint dog wardens, provide dog shelters, seize dogs, impose on-the-spot fines and take court proceedings against dog owners.

IFA propose:

- Local Authorities must do more to enforce the obligations of responsible dog ownership to reduce the unacceptable levels of livestock worrying and sheep killing; disruption to mountain hare and ground nesting birds etc.
- More dog wardens are needed in all counties to ensure all dog owners, including farmers, fulfil their legal requirement to licence, microchip and register their dogs. They must also ensure dog owners keep their animals under control at all times.
- There needs to be greater local and nationally run education and awareness campaigns, particularly in advance of lambing season, around responsible dog ownership.
- The establishment of a single national database for all dogs correlating licensing and microchipping and identifying the person responsible for the dog, but at a minimum alignment of the existing licensing and microchipping records to one central access point.
- Increased sanctions and on the spot fines for failing to comply with the microchipping and licensing requirements; failing to have the dog under control; and for dogs found worrying livestock.
- Legal requirement for dogs to be microchipped and licensed and identified on the NVPS (National Veterinary Prescribing System) prior to any veterinary treatment or prescribing of medicines by veterinary practitioners.
- Authority to apply the legislative obligations to dogs in border regions owned by persons not resident in the state.
- Any amenities or walkways within the jurisdiction of Local Authorities that are in close proximity to farm lands where animals are grazed must prohibit dogs.

25 <https://www.irishstatutebook.ie/eli/2022/si/113/made/en/print>

Crime in Rural Areas

Rural crime is a major concern to farmers and members of the rural community. In 2023, researchers at Technological University Dublin (TU Dublin) found that more than half of farmers surveyed had been victims of theft. More recently, criminal gangs targeted farmers in the Fingal, stealing €100,000 worth of GPS systems, with incidence of illegal hunting; criminal damage to farms; thefts; threats and intimidation on the rise. IFA believes the proposals below need to be addressed to give greater public confidence in the policing of rural areas.

IFA propose:

- Greater visibility, through increased Garda numbers and presence.
- The roll out of national Community CCTV Scheme in rural areas and to resolve GDPR issues for Gardaí in accessing community footage in special cases.
- Increased community policing by getting Gardaí back in communities as the established go-to-person in rural areas.
- Improved response times to reports of crime and calls for assistance.
- Timelier feedback to victims of crime with greater investigation follow up.
- The establishment of a national dedicated multi-agency Rural Crime Task Force.
- The development of Gardaí national policy on trespass and illegal hunting in the handling of victims and perpetrators of these crimes.
- Review and enhance the effectiveness and availability of community alert and property-marking schemes in partnership with rural stakeholders to combat rural crime.

Rural Social Scheme

The Rural Social Scheme is a vital support to low-income farmers, benefiting farmers nationally. Farm Assist²⁶ is also vitally important for low-income farm families, allowing them to continue in production during difficult times.

IFA propose:

- Credits should be provided to farmers on Farm Assist prior to 2007, when they were ineligible to make PRSI contributions under the scheme.
- Rural Social Scheme means review should be undertaken at 3 yearly intervals, instead of the current annual review.
- Farmers who reach the age of 66 should be given the opportunity to stay on the Rural Social Scheme.

Farm Safety

Nationally and internationally, agriculture is one of the most hazardous occupations one could be engaged in. Awareness and education programmes focussed on prevention, through supporting farmers to change behaviour, are the best way to reduce farm accidents. All-terrain vehicles (ATV)/Quads are becoming more popular on Irish farms, leading to an increase in fatal and serious accidents associated with their use.

IFA propose:

- A support package/funding available to farmers to carry out quad safety training courses on their farms.

Roadside Ash Dieback Scheme

Ash dieback was first detected in the Republic of Ireland in October 2012 on plants imported from continental Europe. The introduction of the disease into Ireland was as a result of inadequate controls on the importation of infected plants. The disease is now prevalent throughout most of Ireland and is likely to cause the death of most ash trees over the next two decades.

The Roads Act 1993 places a statutory obligation on landowners to ensure that roadside trees do not present a danger to those using public roads. If a tree or branch falls onto a road and consequently causes injury or damage to an individual or property the owner of the tree will be liable, if found to be negligent.

Farmers are aggrieved that they are being held solely responsible for the removal of ash trees along public roads, when the State is responsible for the introduction of the disease. The cost of safely removing infected trees is substantial, and dangerous, as ash dieback weakens the trees resulting in a high risk of a tree breaking and falling in an uncontrolled manner and the felling of roadside trees requires traffic management on public roads.

IFA propose:

- IFA is seeking the introduction of a financial support package for farmers to manage diseased roadside ash trees. The support package should be administered by the Local Authorities, who would be responsible for coordinating the safe removal of the trees, by providing traffic management during the felling operation and grants to support farmers to hire relevant qualified professionals to safely fell these trees.



Emergency Humanitarian Support Scheme

In more recent times, individual and localised events (e.g. tornado in Wexford; flooding in Cork / Louth / Roscommon etc) have severely impacted farm operations and/or causing significant damage to growing crops; farm roadways; fencing; fodder etc.

IFA propose:

- To alleviate financial pressures and emotional stress involved, in the interest of fairness and equity, those involved in agriculture should have the same access to Emergency Humanitarian Support Scheme (or similar) as any other business.

Horticulture and Potatoes

The actions in the National Horticulture Strategy must be implemented, otherwise the exodus will continue and empty supermarket shelves and/or increased dependence on imports will become the new norm. Better supports are needed and retailers must pay the cost of local sustainable production.

IFA propose:

- Annual funding of €12m for the Scheme of Investment Aid for the Development of the Commercial Horticulture Sector is critical to the expansion of the sector and to meet the demand for investment.
- The Government must act on the eight key strategic actions set out in the National Horticulture Strategy supporting the expansion of the Irish Horticulture sector and commit the extra resources required for research and development and advisory services.
- A seasonal work permit scheme must be put in place for the sector that is fit for purpose. Ireland is one of the only European countries that does not have a bespoke seasonal permit scheme.
- The use of peat needs to be retained as a substrate in the horticulture sector as there are no viable alternatives at present. Continued investment and research must continue to develop commercial sustainable alternatives.
- Compensation must be provided for the disposal of ash plants in the amenity horticulture sector, arising from the Ash-Dieback disease.
- Currently available active ingredients for tillage/ horticulture farmers must be re-authorized for use.

- Irish and EU growers require a level playing field whereby they are not compelled to compete with imported produce produced under environmental and regulatory controls which fall below EU standards.

- The Government must ensure that the EU applies parity of treatment in licencing products with the introduction of an equivalence in standards.

Equine Breeders' Support

IFA propose:

- DAFM support a breeder focused incentive scheme for thoroughbred and sporthorses through Horse Racing Ireland (HRI) and Horse Sport Ireland (HSI) respectively to support Irish grassroots equine breeders.

Aquaculture

The National Strategic Plan for Sustainable Aquaculture Development 2030 is the primary policy document for the Irish Aquaculture sector as it sets out the government policy objectives and key actions until 2030, in line with EU Strategic Guidelines for Sustainable Aquaculture. Considerable investment and appropriate legislative changes will be required to achieve the objectives of the plan.

IFA propose:

- **Water Quality** – There are 64 designated shellfish areas in Ireland as part of the EU Water Framework Directive, which requires all Member States to designate waters that need protection in order to support shellfish life and growth. Adequate funding and resources must be made available to ensure tertiary treatment and must be prioritised for all coastal Wastewater Treatment plants (WWTP).
- **Legislative reform** – To achieve the objectives and specific actions outlined in the Seafood Development Programme 2021-2027 and the National Strategic Plan for Sustainable Aquaculture, it is now critical that a single piece of legislation is brought forward to implement and underpin appropriate aquaculture policy and bring together all the existing primary, secondary and amended legislation in one single provision.
- **Export of Live Bivalve Molluscs** – Since 31st Jan 2024, full animal health certification is required for all live aquatic animals transiting Great Britain. Any delays in export of live molluscs would have a detrimental effect on market access. It is critical that sufficient resources are made available by DAFM to facilitate additional inspection and certification requirements.

- **EU Aquaculture Policy** – The EU strategic guidelines and the National Strategic Plan must be implemented and reform of EU Aquaculture policy must be a priority:

- EU Court of Auditors Report '*EU aquaculture policy Stagnating production and unclear results despite increased EU funding*' noted the lack of indicators of environmental sustainability of aquaculture, as well as the lack of integration of aquaculture in national environmental strategies.

- Aquaculture Advisory Council (AAC)²⁷ called on the EU Commission to European Commission to implement aquaculture policy reform to align aquaculture policy with agriculture and fisheries.

Regional Veterinary Laboratory Network

The six Regional Veterinary Laboratories strategically located in Sligo, Athlone, Limerick, Cork, Kilkenny and Dublin play a vital role in assisting farmers to identify and resolve animal health issues on their farms. This includes early, independent and trusted analytical services. In the context of AMR and Climate targets this role has become even more important.

As part of Project Ireland 2040, the Minister for Agriculture, Food and the Marine in 2019 launched a Plan for the Development of the Department of Agriculture, Food and the Marine's Regional Laboratories, announcing an estimated capital investment of €33.5 million in rebuilding the Laboratory Network over the next 10 years.

The purpose of this financial commitment was to enhance the diagnostic services provided by the regional laboratories to the farming community and to make that service more accessible to farmers throughout the country.

To-date farmers are seeing no evidence of the enhancements committed to by the then Minister for Agriculture.

IFA propose:

- The Government move immediately to implement the 10 Year Plan announced in 2019, invest the funding committed and deliver the enhanced services to farmers and easier access through the regional laboratory network.

Bovine Tuberculosis (TB)

The increasing levels of TB that farmers are having to endure are unacceptable and must be addressed. The most effective mechanism to reduce to TB levels is to reduce the densities of wildlife susceptible to TB that interact with our cattle. This has been established through various studies in this country in the late 1990's and validated beyond question in the progress achieved in reducing the levels of TB in this country from the early to 2000's when the Wildlife Control Programme was rolled out nationally up to 2013 when TB levels were reduced from over 40,000 TB reactors annually to less than 15,000. The UK are currently reporting reduction levels of over 50% in TB levels within areas where they are actively reducing badger density.

The Government have erred in this country in the decision to move towards vaccination as opposed to density reduction, a fact clearly evident in the increased levels of TB that have coincided with the increase in areas under vaccination.

Deer are also contributing to TB spread and the maintenance of outbreaks on farms and in localities. The Deer Strategy Group has been mandated to reduce the numbers of deer in the country and this work must commence.

Displacement of both species due to major infrastructural works compounds the issues and increases the levels of TB spread onto cattle farms.

IFA propose:

- Local Authorities ensure in advance of any major infrastructural works in their regions density reduction measures are implemented for both badgers and deer.

Disposal of Unused/ out-of-date veterinary medicine products

Farmers are required under Veterinary Medicine legislation to ensure safe disposal of unused and/or out of date veterinary medicinal products. There is a distinct lack of a co-ordinated functional means for farmers to dispose of these products as most suppliers do not meet their obligations in providing this service.

IFA propose:

- All Local Authorities provide an accessible outlet for farmers to have these products disposed of.



Disposal of Fallen Animals found on Farmlands

Farmers are legally required to dispose of Fallen Animals where we are the identified 'Keeper' or 'Herdowner' of through the knackery service at a significant cost. When animals that we are not the 'Keeper' or 'Owner' are found 'Fallen' on our lands, frequently we are required/expected to cover the cost of disposal of these animals. This is unacceptable.

IFA propose:

- Local Authorities must accept responsibility for the disposal of these animals in a timely manner and all associated costs.

Forest Road Single Consent System

To support the mobilisation of the private forest resource, although Local Authorities are no longer the consenting authority following the enactment of the Planning and Development (Amendment) Act, 2018, which transferred responsibility for granting consent for the construction of forest entrances onto public roads (other than national roads) or the material widening of an existing entrance, to the Department Agriculture, Food and Marine (DAFM) under the Single Consent System.

The Single Consent system has in-built safeguards for local authorities regarding road safety and their powers under the relevant Roads Acts. Hence, there is a requirement to send the forest road application to the Roads Department of the relevant Local Authority, where they have eight weeks to consider application.

In addition, if a farmer wishes to;

- Construct a forest entrance or material widening of an entrance from a National Road are required to (i) apply for planning permission from the relevant Local Authority and (ii) get consent from the Department of Agriculture, Food and the Marine.
- Depart or seek a relaxation from the Technical Standard Design of Forest Entrances (as agreed by DAFM and Department of Transport Tourism and Sport (DTTAS)), they must apply to relevant Local Authority, before formally applying to the DAFM.

IFA propose:

- The Roads Departments within Local Authorities must work with farmers to ensure cost effective and efficient timber mobilisation from farm forests to minimise red tape and/or the requirement to pay a bond in the construction of forest roads.

Shannon Callows Compensation Scheme

Following persistent adverse weather conditions, the Government launched the Shannon Callows Compensation Scheme on Nov 7th 2023, with €800,000 allocated, for farmers along the Shannon Callows SAC whose lands were flooded and fodder lost, awarding €375/ha for impacted parcels (min 1ha – max 15ha). With some of the budget remaining unallocated, it appears not all flooded parcels, most particularly those with heavy covers, were correctly identified by the Area Monitoring System used, and as a result a cohort of farmers did not receive compensation under the scheme.

IFA propose:

- All farmers whose lands along the Shannon Callows SAC were flooded, and fodder lost, should receive compensation within the Shannon Callows Compensation Scheme.

SECTION 7:

Glossary

AAC	Aquaculture Advisory Council
ACRES	Agri-Climate Rural Environment Scheme
AD	Anerobic Digestion
ANC	Areas facing Natural Constraints
ARC	Action Requiring Consent
ATV	All-terrain vehicle
BAT	Best Agricultural Techniques
BISS	Basic Income Support for Sustainability
BPS	Basic Payment Scheme
CAP	Common Agricultural Policy
CBAM	Carbon Border Adjustment Mechanism
CCAC	Climate Change Advisory Council
CCTV	Closed Circuit Television
CDP	County Development Plans
CI	Connecting Ireland
CIS	Coupled Income Support
CIS-YF	Complementary Income Support – Young Farmers
COPA	Umbrella organisation for European farmers
CRISS	Complementary Redistributive Income Support for Sustainability
CSP	CAP Strategic Plans
DAFM	Department of Agriculture, Food and the Marine
DPER	Department of Public Expenditure and Reform
DPs	Direct Payments
DTTAS	Department of Transport, Tourism and Sport
EAFRD	European Agricultural Fund for Rural Development
EAGF	European Agricultural Guarantee Fund
EIP	European Innovation Partnership
ENVI	European Council on Environment, Public Health and Food Safety
EPA	Environmental Protection Agency
ETS	Emissions Trading System
EU	European Union
FFI	Family Farm Income
GAEC	Good Agricultural and Environmental Conditions
GDP	Gross Domestic Product
GHG	Greenhouse Gas
GLAS	Green, Low-Carbon, Agri-Environment Scheme
GP	General Practitioner
GRFC	Global Report on Food Crises

HRI	Horse Racing Ireland
HSI	Horse Sport Ireland
IED	Industrial Emissions Directive
IFA	Irish Farmers' Association
LESS	Low Emission Slurry Spreading
LIS	Local Improvement Scheme
LULUCF	Land Use Land Use Change and Forestry
MEP	Member of European Parliament
MFF	Multi-annual Financial Framework
MRV	Measurement, Reporting and Verification
N/ha	Nitrogen per hectare
NAP	Nitrates Action Programme
NASCO	National Agricultural Soil Carbon Observatory
NBP	National Broadband Plan
NGT	New Genomic Techniques
NPF	National Planning Framework
NPWS	National Park and Wildlife Service
NRL	Nature Restoration Law
NTA	National Transport Authority
NVPS	National Veterinary Prescribing System
OC	Overhead costs
OECD	Organisation for Economic Co-operation and Development
POs	Producer organisations
PPN	Public Participation Network
RDP	Rural Development Programme
REAP	Results-Based Environment-Agri Pilot Project
REPS	Rural Environment Protection Scheme
RZLT	Residential Zoned Land Tax
SAC	Special Area of Conservation
SBCI	Strategic Banking Corporation of Ireland
SME	Small-Medium Enterprise
SPA	Special Protection Area
SUR	Sustainable Use of Plant Products
TAMS	Targeted Agricultural Modernisation Scheme
TB	Bovine Tuberculosis
TFI	Transport for Ireland
UCD	University College Dublin
UTP	Unfair Trading Practices
WPRN	Water Point Reference Number
WWTP	Waste Water Treatment Plant



APPENDIX

Thomond Park Declaration on climate action: April 2023

In January 2023, IFA held a Climate Summit in Thomond Park, Limerick attended by over 400 farmers and many representatives across the sector. The Summit was addressed by Minister Charlie McConalogue and representatives from Teagasc, Bord Bia, the EPA and the IFA. IFA recognises the importance of climate action as well as enhancing biodiversity and water quality.

Like all citizens, farmers are playing their part to reduce emissions, protect water quality and safeguard biodiversity. Following the Summit, the IFA Environment Committee and the IFA National Council compiled and agreed this Declaration, which summarises IFA's position on a number of climate and environmental issues.

Balancing Climate Action & Food Production

Our grass-based livestock and arable systems are among the world's most climate-efficient food production systems. Farmers will work to reduce emissions by adopting measures in the Teagasc Marginal Abatement Cost Curve (MACC) and other reasonable policy measures that do not negatively impact farm family incomes, the rural economy or food production.

Environmental measures undertaken by farmers are, in

many cases, leading to increased costs at farm level. The marketplace must return a higher price to farmers to cover these increased costs of food production.

Emissions from food production must be treated differently from emissions from non-essential economic activity. The focus must be on the sustainable development of our farming and food sector to ensure an adequate supply of food for human nutrition.

Environmental, Social & Economic Sustainability

As set out in Food Vision 2030, there must be a balance between environmental, economic and social sustainability. To ensure this, rigorous assessments of all EU and national policy proposals are required to understand their impact

on farm viability, the rural economy and the social viability of rural areas. IFA cannot support policies that negatively impact the livelihood of farm families and the economic and social sustainability of rural Ireland.

Accurate Calculation of Emissions & Removals

There must be an accurate measurement of greenhouse gas emissions and carbon removals at farm level. It was accepted at the IFA Climate Summit that research is ongoing to facilitate more accurate estimates of emissions from Irish agriculture and land use. In the future, it is imperative that any measurement of emissions and removals is based on research that reflects Irish conditions.

On-farm sequestration and biogenic methane from livestock, along with emissions and removals from Ireland's unique mineral and peat soils, must be based on peer reviewed trials in Ireland. On-farm measures such as anaerobic digestion and rooftop solar should count towards reducing emissions from the agricultural sector.



The Risk of Carbon Leakage

The Climate Action and Low Carbon Development (Amendment) Act 2021, requires the Government to take account of the potential for carbon leakage to arise from climate policies in Ireland. Carbon leakage occurs when food production is curtailed in one region (e.g. Ireland) and shifts to another region (e.g. Brazil) with a higher carbon footprint.

Independent, peer-reviewed assessments of the potential for 'carbon leakage' from climate policies must be carried out. Without such assessments, there are genuine concerns that policies that reduce food production in Ireland will actually lead to an increase in global emissions as that food will be produced elsewhere with a higher carbon footprint.

Land Use Change Issues

Policy measures around land use change including the forestry programme, biodiversity proposals and rewetting must all be agreed with farmers. IFA will not agree with land being designated or re-wetted without prior agreement with farmers and full compensation must be provided for any reduction in farming activity or associated impairment of land values.

The Irish Government must ensure that Irish farmers are not being treated unfairly in EU proposals, such as the proposed Nature Restoration Law, the Sustainable Use Regulation, EU Taxonomy Regulation and the Industrial Emissions Directive.

New Funding

New funding is required to support farmers and the wider agricultural sector to achieve our environmental objectives. This must include renewable energy as well as research funding to maximise the potential for technology-based solutions to help agriculture reduce emissions, protect water quality and enhance biodiversity.

The Common Agricultural Policy was introduced to support food production. Continuing to raid and repurpose it for environmental measures will not work. There must be new funding for taking on optional environment measures, land-use changes and renewable energy initiatives. This must go to farmers, not investment funds.

Some Farming & Climate Facts

67%

of all slurry spread on dairy farms in 2021 was applied via low emissions slurry spreading (LESS). This has increased from just 5% in 2018

Source: Teagasc sustainability report 2021

Average pesticide usage (kgs/hectare)

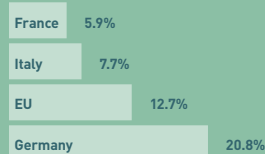
EU-27 2.08

OECD 0.93

IRELAND 0.64

Source: Ireland/EU - 2020 data (Eurostat)
Source: OECD - 2016 data (most recent available)

The 2020 percentage of farmland under agri-environmental schemes in Europe



IRELAND 32.6%

Source: European Commission

59%

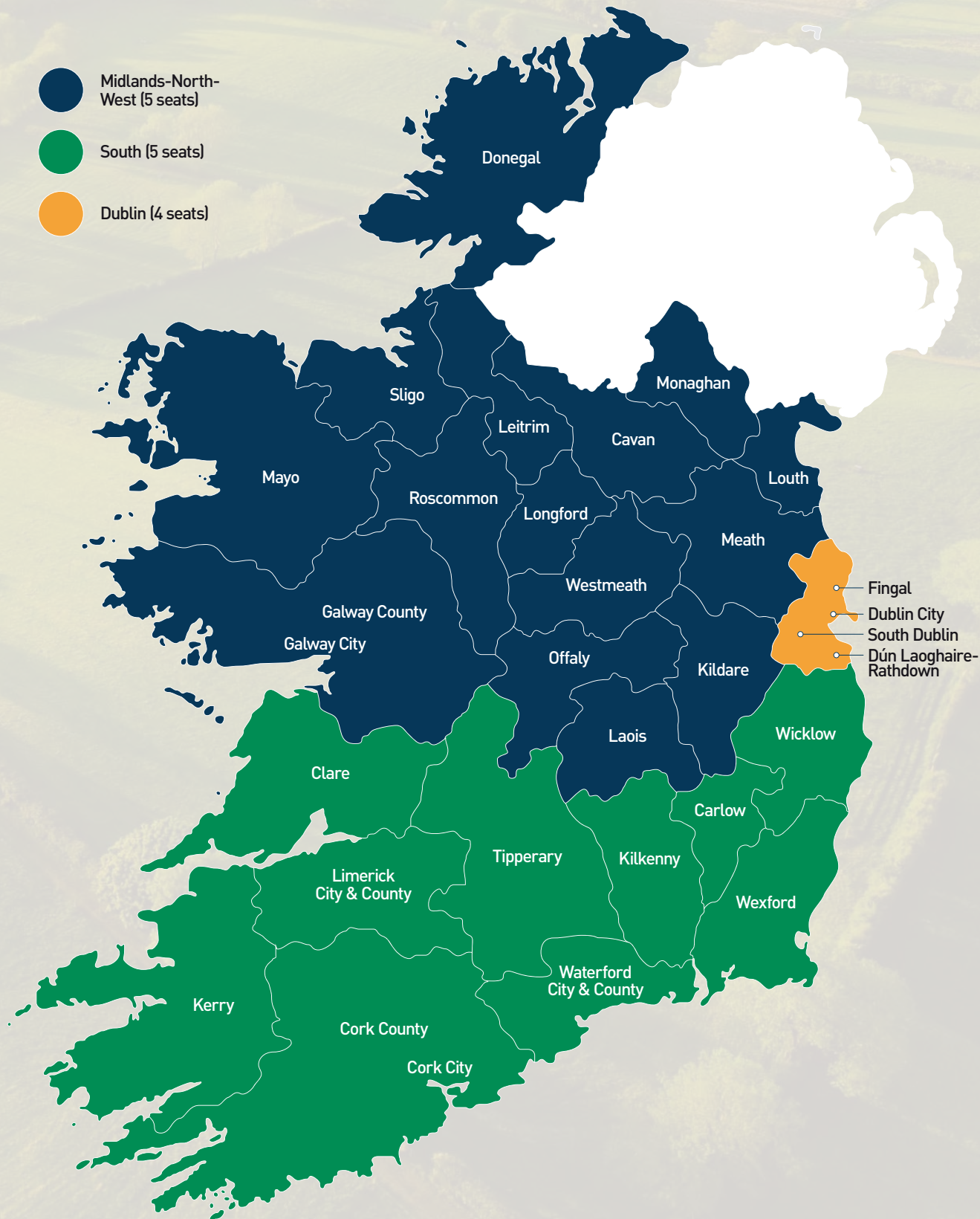
increase in use of protected Urea in 2022

Source: Department of Agriculture, Food and the Marine



European Parliament Election Constituencies in Ireland

- Midlands-North-West (5 seats)
- South (5 seats)
- Dublin (4 seats)





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