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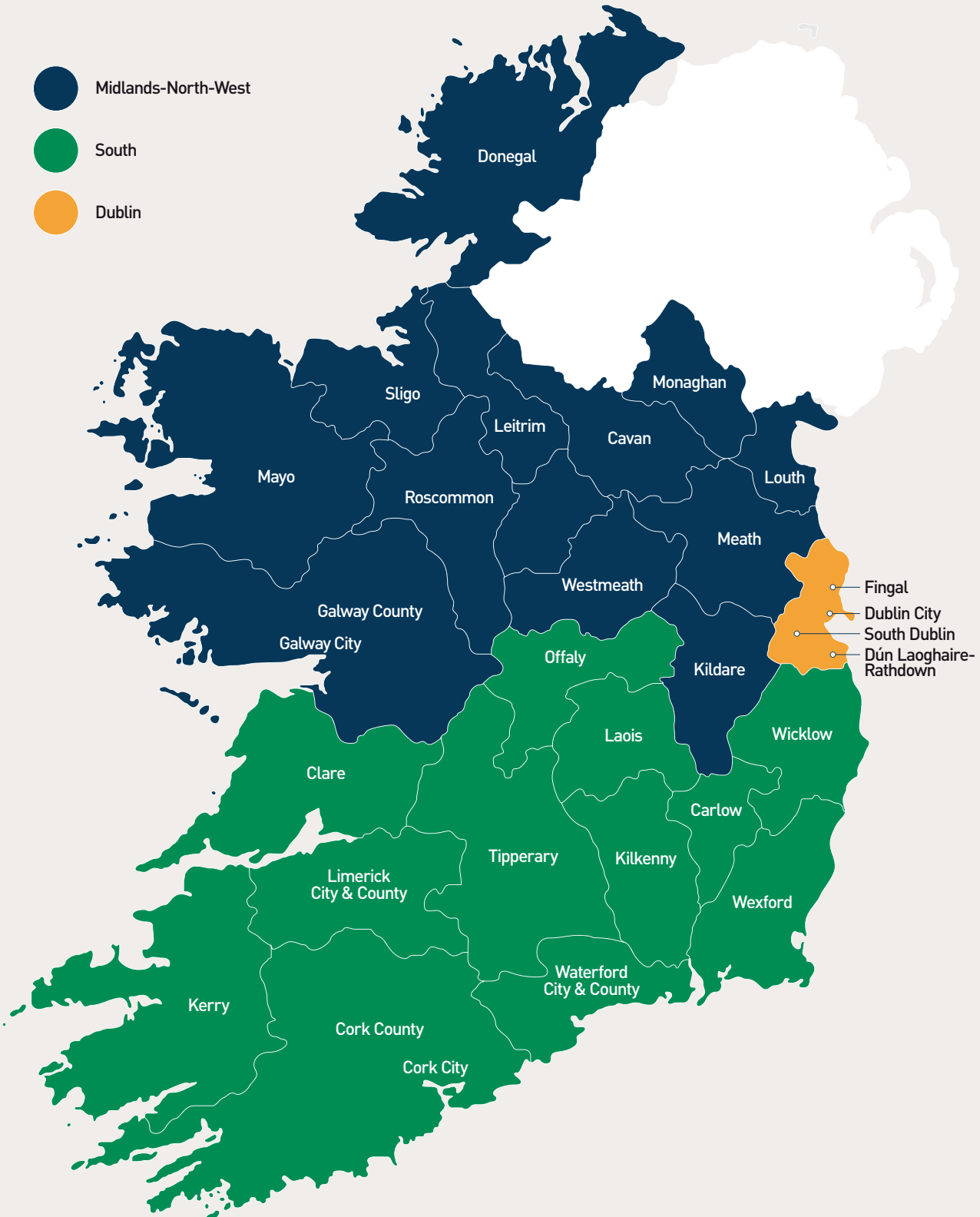
Manifesto for European Parliament & Local Government Elections 2019

The Irish Farmers' Association April 2019



www.ifa.ie

EU Constituencies in Ireland



Manifesto for European Parliament & Local Government Elections 2019

IFA European Election Candidate Meetings

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

Midlands-North-West Constituency

- Wed, April 24th – McWilliam Park Hotel, Claremorris, Co Mayo
- Wed, May 1st – Bloomfield House Hotel, Mullingar, Co. Westmeath

South Constituency

- Tues, April 30th – Springfort Hall, Mallow, Co. Cork
- Tues, May 7th – Springhill Court Hotel, Kilkenny.

All meetings start at 8pm

For further information please contact:
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A strong CAP is vital for family farm income.

Presidential Address

In Ireland, we are proud European citizens who believe in and support a strong and unified Europe. The Single Market is a unique agreement between countries promoting cooperation and building strong ties across European nations. The role played by European representatives at all levels, is key to such success.

The Common Agricultural Policy (CAP) is critical to ensure a safe supply of top quality food at affordable prices, to keep rural areas alive and to enhance our environment. The EU consumer now spends only 12.2% of their household income on food and non-alcoholic beverages, while the figure is under 10% in Ireland.

Irish and European farmers provide consumers with a system of food production that meets the highest standards in the world at a price that is affordable. To sustain these standards, farmers need continued support as they are not getting an adequate return from the market.

The CAP supports high-quality European food production, but is facing more cuts. This cannot continue if we want a diversified family-based model of farming to survive in Europe. The CAP budget must take account of inflation and farmers must be remunerated for any additional asks.

Brexit presents the biggest threat to Irish agriculture in a generation. While the focus to date has been on the Withdrawal Agreement, the next phase of negotiations, the future trading relationship, will be at least as challenging. Our MEPs will have a key role to play in this.

As we approach the 2019 European Parliament and local government elections, farmers and their families will engage with political parties and election candidates on a range of policy issues that need to be addressed.



European priorities

- CAP reform 2021-2027: Key aspects of the proposed Commission regulations are considered; our first priority here remains a fully-funded CAP Budget.
- Brexit is a key challenge for Irish farmers, as the most exposed group in Europe we are seeking a special support package, with specific asks for our beef farmers.
- IFA is also concerned with trade deals such as Mercosur which risks compromising vulnerable sectors and undermining the quality and standards attained by European farmers.
- We are committed to addressing the climate challenge and have outlined proposals for the bioeconomy and renewables sectors. These must be underpinned by appropriate metrics, supportive regulation and more strategic joined-up thinking to achieve the desired agricultural ambition outlined in the CAP.

Local Government priorities

- The provision of services for rural dwellers, a review of LCDC and Leader processes and an increased focus on recreation and walks schemes for rural Ireland are local priorities.
- Other issues concerning our members relate to: crime prevention, improved broadband and increased litter and dog controls defending farmers and vulnerable rural communities.

This Manifesto sets out the issues IFA members will be raising with the political parties and candidates in advance of the European and Local Elections on May 24th. With over 300,000 votes at stake in Irish farming households, farmers and their families will make their decisions on polling day based on the responses they get from candidates and the political parties.

Joe Healy
President

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Glossary

ANCs	Areas of Natural Constraints
AMR	Antimicrobial Resistance
BPS	Basic Payment Scheme
CAP	Common Agriculture Policy
EID	Electronic Identification
EPA	Environmental Protection Agency
GHGs	Greenhouse Gas Emissions
GDPR	General Data Protection Regulation
GLAS	Green Low-Carbon Agri-Environment Scheme
GMO	Genetically Modified Organisms
GNI	Gross National Income
LCDC	Local Community Development Companies
LIS	Local Improvement Scheme
MFF	Multiannual Financial Framework
NBP	National Broadband Plan
NPWS	National Parks and Wildlife Service
RDP	Rural Development Programme
REPS	Rural Environmental Protection Scheme
RIA	Regulatory Impact Assessment
RSS	Rural Social Scheme
SAC	Special Area of Conservation
SMEs	Small Medium Enterprises
SPA	Special Protected Areas
TAMS	Targeted Agriculture Modernisation Scheme
TRQ	Tariff Rate Quota
USO	Universal Service Obligation
UTPs	Unfair Trading Practices



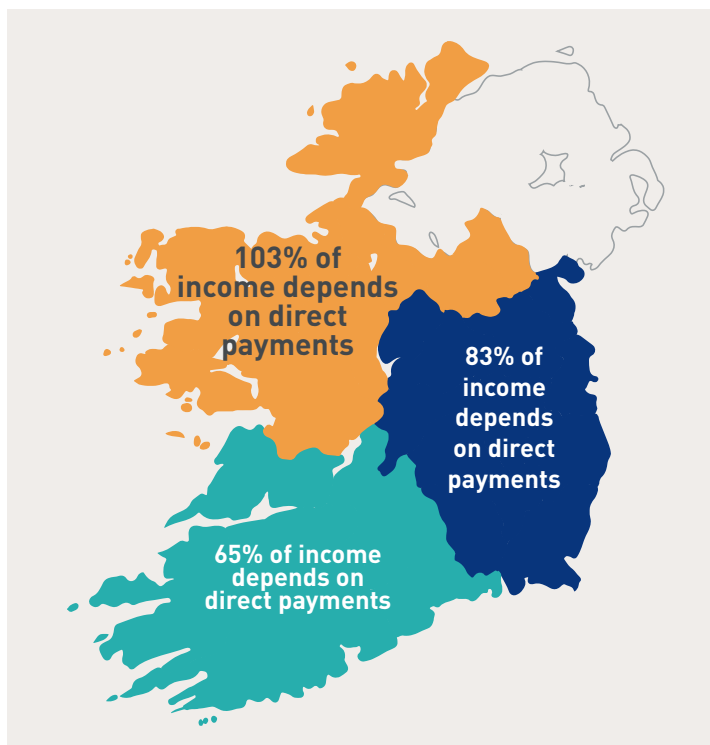
European Parliament Elections

Introduction

The Irish agri-food sector continues to deliver significant employment and export growth. It is our largest indigenous sector, with exports worth over €13bn. Direct employment in the sector continues to grow, with 174,000 currently employed, the sector generates 22% of all industry gross output. The economic activity from agriculture is supported by strong linkages up and down the supply chain. Also a larger proportion of what is spent locally stays local, with 74% of raw materials and services sourced from Irish suppliers and a lower profit repatriation outflow than other sectors. Agriculture contributes significantly to the rural economy and to balanced regional development.

The Common Agricultural Policy (CAP): State of play

Figure 1: Regional dependency on direct payments



The CAP is designed to support agriculture, and provide European consumers with a secure and safe food supply. The current CAP is due to come to an end in 2020. The new CAP regulations and the Multiannual Financial Framework (MFF) are currently being negotiated. The MFF proposals put forward a reduced proportion of the EU budget be allocated to CAP, as other EU policy areas are given priority. The new CAP regulations contain greater subsidiarity (decision by member states within EU objectives) and increased environmental and climate related asks from farmers.

CAP drives activities at farm-level as holdings are required to meet with standards, comply with regulations and in the current proposals reach output targets. As markets do not return the full value for those standards, farmers need CAP support payments (Figure 1). The new CAP proposals place increased demands on farmers with a reducing CAP budget. Communications from the EU Commission on CAP are outlined below. Commissioner Hogan’s first communication was published on the 29th November 2017, which set out the pathway for the future of CAP, with the MFF and regulations published in May and June 2018 respectively.

Source: Parliamentary Budget Office, "An Overview of the Common Agricultural Policy (CAP) in Ireland and potential regional and sectoral implications of future reforms". November 2018

Timelines			
29th November 2017	2nd May 2018	1st June 2018	Next Steps (Annex I)
"The Future of Food and Farming"	Proposed Budget "MFF 2021-2027"	Proposed Regulations "COM (2018) 392"	Final agreement on MFF and CAP Regulations

1. CAP Budget 2021-2027

The EU Commission published the MFF 2021-2027 on 2nd May 2018. A €1.2 trillion EU budget is proposed, representing 1.11% of GNI¹ for Member States. Despite Brexit, this would mean a higher overall EU Budget than the previous MFF period of 2014-2020. Yet the Commission have proposed a reduction meaning that the CAP budget would be 28.5% of the overall EU budget down from over 55% in the 80s.

The current proposals represent a cut to the Irish CAP budget of €97m pa (5% in nominal terms) (Table 1). With the 2% EU proxy rate of inflation applied, the real impact of the cut amounts to 17% for Ireland.

Multiannual Financial Framework (MFF)

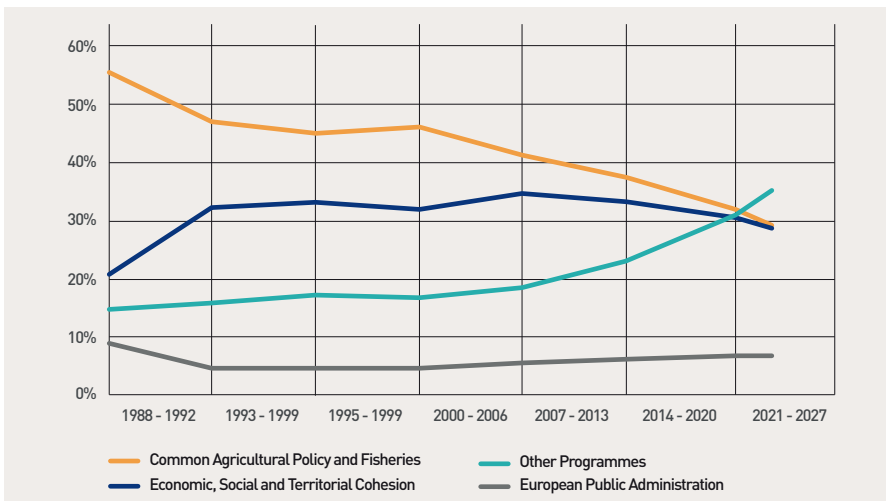
Table 1: EU Commission proposals on the EU budget (MFF) and CAP budget

	Current CAP 2014-2020	Proposed CAP 2021-2027	Total difference	Annual difference	% Change
MFF (EU Budget)	€1,087.1bn	€1,279.4bn	+€192bn	+€27.4bn	+17.6%
CAP Budget	€408bn	€365bn	-€43bn	-€6.14bn	-10.5%
% of MFF	38%	28.5%			
CAP - Ireland	€10.67bn	€10bn	-€678m	-€97m	-6.34%
Pillar I	€8.489bn	€8.147bn	-€342m	-€49m	-15.3%
Pillar II	€2.189bn	€1.853bn	-€336m	-€48m	-15.3%
CAP - Ireland adjusted for inflation*	€10.768bn	€8.87bn	-€1,792m	-€256m	-16.8%

Source data: EU Commission. Based on EU Commission proxy of 2% per annum for future inflation.

The percentage of the overall EU budget allocated to CAP under this proposal will be 28.5%, reflecting a downward trend in CAP funding as a percentage of the overall budget since the 1980s (Figure 2). Under the current EU budget, 2014-2020, the CAP allocation is 37.6%. By 2020 this will have fallen to 34.7%.

Figure 2: Programmes funded under EU budget 1988-2027



Source: EU Commission

IFA proposes:

- The CAP budget be increased to take account of inflation and to compensate farmers for any additional requirements placed upon them as a result of this CAP reform.

1 Gross National Income

2. Possible rollover of CAP 2014-2020

The CAP reform process has moved more slowly than anticipated. The EU will not arrive at a decision on the CAP reform proposals in the lifetime of the current Parliament and the European Commission (2014-2019). Therefore, it is unlikely to have an agreed policy until summer 2020.

It is expected that the current CAP will require an extension of 1 year (from 1st Jan 2021 to 31st Dec 2021) and possibly 2 years (to 31st Dec 2022) to allow for the preparation of national strategic plans by member states and their approval by the EU Commission.

IFA proposes:

- That should the CAP be rolled over, it is critical that the budget is in place to avoid any linear cuts in direct payments and to fully facilitate a seamless transition for farm schemes under Pillar II such as GLAS, TAMs and ANCs.

3. CAP Reform Proposals

The EU Commission published the legislative proposals on 1st June 2018, which outline the details of the 2021-2027 CAP reform, describing them as a fundamental shift in the CAP. Member States must now design national strategic plans, encompassing CAP Pillar I and Pillar II. These plans are designed in each Member State and be presented to the EU Commission for approval.

The IFA held ten regional meetings in late 2018 and early 2019 to seek the views of members on the proposals. The IFA's position on key matters at this point in the process is set out below.

Convergence

The convergence concept is designed to redistribute direct payments between farmers. In previous CAP reforms (2014-2020), farmers with per hectare payments below the national average had their payment per hectare increased by an amount equal to one third of the difference between their actual payment level and 90% of the national average, with each farmer's per hectare payment being brought up to at least 60% of the national average.

The cost of bringing these farmers up (€104m) was funded by reducing the per hectare payments of farmers above the average payment per hectare, regardless of how few

hectares they had. Under the current reforms, further convergence proposes that all per hectare payments are brought up to at least 75% of the national average by 2027. IFA estimates that this convergence would cost €30m.

IFA proposes:

- That the EU Commission position be supported to increase the payments per hectare for genuine farmers with payments below the national average. However, it must be funded through an increase in the CAP budget or from the implementation of the EU genuine farmer definition (see below). It cannot be funded by reduced per hectare payments above the average. The objectives of convergence should be achieved through upwards only adjustments in payments per hectare.
- That a full sectoral impact analysis of the convergence proposals be conducted. CAP reform 2021-2027 must not create more unviable farmers (Annex II).

Genuine farmers

The EU Commission proposes Pillar I direct payments go only to genuine farmers. Their definition is as follows:

"The Commission proposes 'genuine farmers' shall be defined in a way to ensure that no support is granted to those whose agricultural activity forms only an insignificant part of their overall economic activities or whose principal business activity is not agricultural, while not precluding from support pluri-active farmers. The definition shall allow to determine which farmers are not considered genuine farmers, based on conditions such as income tests, labour inputs on the farm, company object and/or inclusion in registers".

IFA proposes:

- The genuine farmer concept be fully explored in the context of the need to target payments towards active farmers. A further issue to be evaluated in the context of defining the genuine farmer, is the practice of farmers leasing out their entitlements, having exited farming.

Coupling

There are options under the EU Commission proposals to have coupled payments up to 10% in Pillar I. Ireland currently only has one coupled payment under Pillar I for protein crops.

IFA proposes:

- In the context of increased CAP funding the option of introducing more coupled payments as part of the next CAP must be considered in targeting support to active farmers in vulnerable sectors.

Capping

The EU Commission proposes capping of payments within the following thresholds.

EU COM(2018) 392, Article 15: Reduction of payments:

“Member States shall reduce the amount of direct payments to be granted to a farmer for a given calendar year exceeding €60,000 as follows:

(a) by at least 25 % for the tranche between €60, 000 - €75,000;

(b) by at least 50 % for the tranche between €75,000 - €90,000;

(c) by at least 75 % for the tranche between €90,000 - €100,000;

(d) by 100 % for the amount exceeding €100,000.

Before applying paragraph 1 (capping limits), Member States shall subtract from the amount of direct payments to be granted to a farmer pursuant to this Chapter in a given calendar year:

(a) the salaries linked to an agricultural activity declared by the farmer, including taxes and social contributions related to employment; and

(b) the equivalent cost of regular and unpaid labour linked to an agricultural activity practiced by persons working on the farm concerned who do not receive a salary, or who receive less remuneration than the amount normally paid for the services rendered, but are rewarded through the economic result of the farm business.

To calculate the amounts referred to in points a) and b), Member States shall use the average standard salaries linked to an agricultural activity at national or regional level multiplied by the number of annual work units declared by the farmer concerned”.

IFA proposes:

- That the current EU Commission position on capping be supported.
- That leased-in entitlements are excluded from the calculation, and family employment and formal partnerships are factored in.

Eco-schemes

Under the EU Commission proposals, the New Green Architecture contains eco-schemes as part of Pillar I. This is mandatory for Member States, but voluntary for farmers. The EU Commission proposals also include that the allocation of funding for environmental schemes, combined from Pillar I and Pillar II, should be greater than 40%, (this excludes ANCs).

IFA proposes:

- Pillar I eco-schemes should be voluntary for Member States and farmers.
- Measures under any Pillar I eco-schemes must not undermine environmental schemes in Pillar II.
- Where eco-schemes are entered into, they should not involve additional costs on the farmer, and the schemes must be simple and easy to apply for.
- ANCs should be allowed as part of the 40% environmental calculation requirement (Pillar I and Pillar II).

Simplification and subsidiarity

The EU Commission proposals contain a commitment to have increased simplification. The opportunity under this reform to design national strategic plans must be used to support the delivery of a CAP, which is simpler and more suited to Irish farming, with fewer inspections, increased tolerances and reduced penalties.

IFA proposes:

- All farmers, including those selected for inspection, must get at least 70% of their BPS payment in mid-October. Issues arising for farmers selected for inspections thereafter can be resolved from the 30% balancing payment.
- A close-out system on inspections to allow farmers time to correct unintentional non-compliances without incurring penalties.
- No increase in cross-compliance requirements, with full recognition for existing Statutory Minimum Requirements (SMRs) and Good Agricultural and Environmental Conditions (GAECs) achieved by farmers.
- Targets and indicators imposed on Member States must be realistic and not add to complexity or delay payments.
- Farmers must be adequately compensated to cover costs of any increase in requirements and standards.

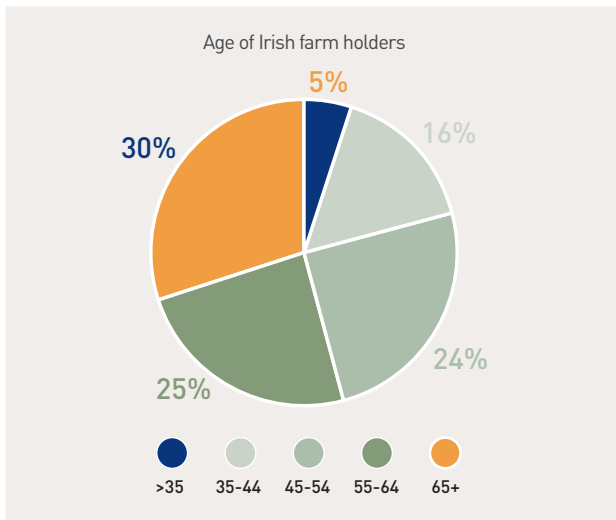
Rural development

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 proposes:

- Increased funding from €4bn to €5bn for the RDP 2021-2027 to support farm schemes.
- Targeted sectoral support for sucklers (€200/cow), sheep (€30/ewe) & tillage (per/ha payment).
- Whole farm environmental schemes, similar to REPS, with a maximum payment of €10,000 per farm, with higher payments for designated Natura SAC and SPA lands.
- 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 50% for all others.
- Introduction of increased funding to support farmers involved in environmental and economic resource efficiency programmes, such as the Smart Farming programme.
- Strong measures to support committed young farmers across all schemes.
- Minimise leakage of funds for advisory and service providers.
- The introduction of user-driven knowledge exchange models, such as e-Learning tools.
- A payment for EcoSystem Services, for biodiversity and establishment of more broadleaf woodlands.

Figure 3: Profile of Irish farm holders



Generational renewal

The CAP must ensure young farmers are attracted into the sector through tailored tax incentives, policy instruments and farm schemes. Less than 5% of Irish farm holders are under 35 years (Figure 3).

IFA proposes:

- Strong support for committed young farmers to include: preferential national reserve, top up payments (BPS TAMs and Installation aid), 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.

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 proposes:

- CAP post 2020 continues 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.
- The environmental requirements under Article 44 of COM(2018) 392/3 CAP reform 2021-2027 should be retained at current levels.
- Potato producers must qualify under the EU Fruit and Vegetable PO scheme.

4. Brexit

Brexit is the most significant threat facing the agri-food sector in the history of the State. The Irish agri-food sector is most exposed to Brexit and the rural economy will be disproportionately affected due to the location of agri-businesses.

- IFA fully supports the EU and the Irish Government position on the backstop.
- IFA's overall objective is: no hard border on the island of Ireland, no border in the Irish sea, no scope for the UK to pursue a cheap food policy and no cuts to the CAP budget.

Following the European Council meeting of 10th April which granted the UK a flexible extension up to 31st October, the uncertainty continues. Based on the outcome of the Council, the UK can now leave with a Withdrawal Agreement any time up to 31st October. Alternatively, they would leave with no deal on 1st June, if they do not hold the European Parliament elections. While a Withdrawal Agreement is much more preferable to a 'no deal' Brexit, neither scenario will be good for Irish agriculture. Irrespective of the immediate outcome, the IFA's objectives for any new EU-UK trading relationship are as follows:

- **Tariff-free and quota-free trade for agri-food products between the EU and the UK.**
 - **Full UK regulatory alignment to current and future EU standards, including rules on agricultural production, marketing, food safety and labelling, animal health/welfare and environmental standards, as well as full guarantees of a level playing field.**
 - **Full UK application of the EU's Common External Tariff and Tariff Rate Quotas (TRQs) to ensure no increase in third country imports of agri-food products.**
 - **Full access to the UK market and the land bridge route to the EU through Britain.**
- **An increased CAP budget to make up for the €12bn shortfall arising from Brexit, so that the real value of the budget is protected.**

Brexit already represents a major market disturbance for Irish farmers in all sectors. The more exposed sectors include mushrooms, dairy (in regard to cheddar cheese and butter) and pigs. However, the most vulnerable sector is clearly livestock, with 50% of all Irish beef exports going to the UK market and no alternative market available.

In response to Brexit, the Irish farming and food sector requires extensive Government and EU support measures, which need to be flexible and sufficiently scalable to deal with all possible outcomes.

IFA proposes:

- **A special purpose package, including emergency EU market disturbance supports and targeted direct producer payments, as well as long term structural adjustment support, for all sectors.**
- **The setting-aside of State Aid limits.**
- **In the event of a no-deal, an immediate EU aid package must be triggered to support farmers and maintain current retail positions on UK shelves.**
- **Currency devaluations arising from the weakness of sterling must be factored into all EU aid measures.**

5. Brexit Beef Crisis

The beef and livestock sector, involving 100,000 farmers and with an output value of up to €3bn, is of critical importance to Ireland. Beef farmers are encountering an income crisis as a result of very weak cattle prices below the costs of production, increased costs and reduced direct payments. The income situation is now a severe crisis due to the fall in cattle prices, the weakness of the sterling and uncertainty around Brexit.

With over 50% or 298,000t of Irish beef exported to the UK market in 2018, a hard Brexit or a no-deal Brexit would be a disaster for the beef sector.

Irish livestock farmers who have sold cattle since last Autumn have already taken a major financial hit as a result of Brexit. This spring, cattle prices are down 25c/kg compared to last year or €100 per head. Some farmers feeding young bulls have faced price cuts of 40c/kg or over €200 per head.

IFA proposes:

- **For Brexit losses already incurred since autumn 2018, the Government and the EU Commission must immediately introduce an aid package for beef farmers. It should use the cattle numbers and price information based on the Department of Agriculture's Animal Identification and Movement Systems (AIMS) and price reporting databases, to develop an aid scheme based on the payment of €20 per head for every 5c/kg price drop.**
- **For Brexit-related losses going forward, the Government and the EU Commission must provide a comprehensive package of market support measures and direct aid for livestock farmers to cover all of the market implications, as well as additional costs arising from the departure of the UK from the EU.**

6. EU Trade Policy

MEPs must strongly resist any damaging EU-Mercosur trade deal. These countries (Brazil, Argentina, Uruguay and Paraguay), fail to meet EU standards² on the key issues of animal health, food safety and the environment. The EU must insist that all EU imports meet full EU standards. In addition, Mercosur countries have four times the carbon footprint of Irish beef and involve the destruction of the Amazon rainforests. The Australia and New Zealand negotiations with the EU are ongoing, with little opportunity for Irish agriculture.

The EU must not agree any trade deal which:

- Further compromises the viability of sectors, such as beef in agriculture.
- Sets a double standard in the market and undermines the quality and standards of EU food.

7. Environment, Climate Action and Renewables

Ireland has a carbon efficient model of food production. The European Commission’s Joint Research Centre has confirmed that Irish dairy farmers have the lowest carbon footprint for milk in the EU and Irish beef farmers are amongst the five most carbon efficient in the EU³. In addition, the majority of Ireland’s drinking water is of “excellent quality”⁴.

Farmers are committed to the protection of natural resources. Emissions from agriculture have reduced since 1990 (Figure 4), in this time output has also increased, this reflects environmentally efficient expansion.

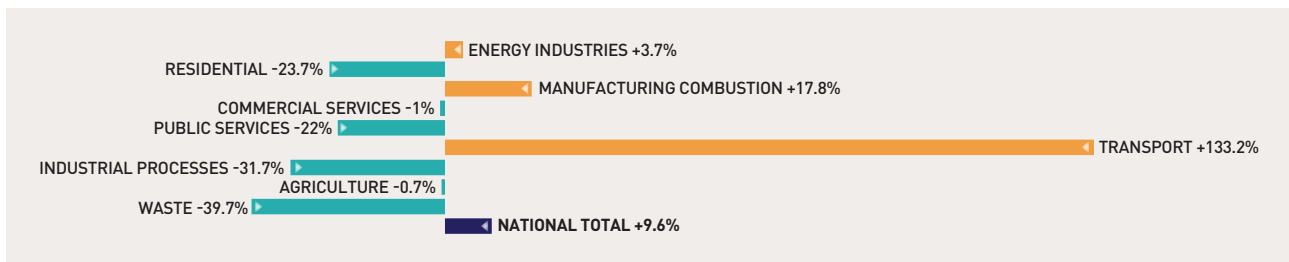
In Ireland, programmes such as the IFA/EPA Smart Farming programme and Bord Bia’s Origin Green programme are widely implemented at farm level.

IFA continues to engage in the protection of the long-term future of farming. However, urban waste water management, air quality compliance, renewables and climate challenges remain.

Innovative policy design is necessary to achieve the full potential of the bioeconomy in terms of rural job creation and much needed spin-off into rural communities. Farming and forestry can play a significant carbon sequestration role in the development of a strong bioeconomy.

On renewables, it is estimated that 1.19m people are employed across the EU, with 389,000 of these jobs in the solid biomass sector. Support schemes must be designed in a holistic fashion, to facilitate rather than present barriers to the future development of the bioeconomy.

Figure 4: Climate emissions by sector



Source: EPA

2 Three relevant 2018 audits on Brazil and Argentina: Residues and contamination in live animals and animal products (2018-6349) and Beef, horse and poultry meat (2018-6460); Animal Health (2018-6429).
 3 European Commission Joint Research Centre (2010) Evaluation of the livestock sector’s contribution to the EU greenhouse gas emissions (GGELS) - Final report.
 4 Irish Water (2015) Water services strategic plan.

Bioeconomy

IFA proposes:

- The development of a dedicated EU bioeconomy programme to facilitate investment and establishment of community and farm-based supply-chains. This funding must come from sources outside of the CAP.
- The European Investment Bank should prioritise and commit a targeted minimum funding allocation to community based and locally-led bio-based/renewable projects, rather than large scale commercial entities.

Climate action and renewables

IFA proposes:

- The completion of a Regulatory Impact Assessment (RIA)⁵ by the EU Commission for each Member State, to assess the impact on jobs and on the environment in achieving the “climate neutral” proposals by 2050.
- That the EU Commission outlines how a “climate neutral” Europe can be achieved, while not compromising sustainable food production in the EU⁶.
- Amendment of the existing Renewable Energy Directive to introduce:
 - Farm scale and community renewable energy targets for each Member State.
 - Minimum community share ownership in medium to large scale local renewable projects, and low-cost funding to facilitate purchase of same.
- The development of an overarching renewable energy strategy at Member State level.
- The development of a prosumer strategy, which includes financial support for microgeneration to facilitate an energy mix in households.
- Priority grid access for farmers, small scale suppliers and community renewable projects.
- The planning restrictions and requirements for renewables projects must be appropriate to scale.

Environmental metrics

IFA proposes:

- A review of the existing practice of benchmarking the GHG emissions, recognising the short-term life-span of methane in the atmosphere.
- The carbon accounting methodology is reviewed. Carbon sequestered on farms through grassland, forestry and renewables should be allocated to the agricultural sector.

Environmental regulation

IFA proposes:

- The current review of the Water Framework Directive 2000/60/EC makes provision for a full package of measures, including compensation, where farmers endure crop yield and income losses when farming practices are restricted.
- The continuation of Ireland’s nitrates derogation at 250 kgs Org N/ha, without excessive compliance obligations. Supporting the sector’s on-going development and contribution to the national economy.
- A review of the Ammonia Directive (EU) 2016/2284, given the absence of affordable technical solutions.



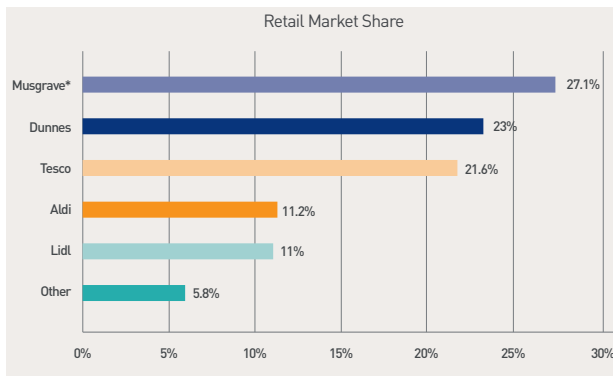
Dr. David Wall (Teagasc) demonstrating good soil management at a Smart Farming event in Co. Offaly.

⁵ RIA should assess the economic and environmental impact of proposed changes in regulations to the wider economy at Member State level.
⁶ Paragraph 2.14 in the European Union’s Heads of Government climate and energy agreement which states that when deciding on climate plans, regard must be had for the multiple objectives of the agriculture sector as food, fuel and energy producers, as well as environmental enhancement and the lower mitigation potential of the agriculture sector.

8. Retail Regulation: Unfair Trading Practices (UTPs)

IFA has welcomed the initiative by the EU Commission in prioritising the imbalance in the food supply chain and recognising the vulnerability of producers in it. The introduction of a minimum common standard of protection across Member States is welcomed, but this is only a first step in reining in retailers and rebalancing power in the food chain. Almost 72% of the market share is held by three retailers. This increases to almost 94% when considering the top five (figure 5), demonstrating the dominance of powerful Irish supermarkets. The situation, where processors and retailers always make a margin while farmers are sometimes forced to produce at or below the cost of production, is totally unacceptable.

Figure 5: Competition in retail



Source: Kantar March 2019 *SuperValu (21.3%) & Centra (5.8%)

IFA proposes:

- The EU must now progress and oversee the transposition by Member States of the Directive into national legislation.
- The EU must now ensure that the common European Framework provided for in the Directive is implemented and complements existing national legislation.
- The EU must now ensure that Member States appoint a designated 'public authority' for the purpose of enforcement of the Directive.
- The EU must now ensure that, as provided for in the Directive, there will be a review in 4 years.

Market transparency & price reporting

IFA has called for greater market 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, from retail back to the primary producer, and farmers receive a price above the costs of production, which provides a viable margin.

In addition, IFA is demanding that the lack of competition in many sectors is addressed by the Government and the EU Commission. There needs to be full price and margin transparency along the supply chain, with compulsory price reporting. The *USDA Food Dollar* and the *French Observatoire de la Formation des Prix et des Marges* are models upon which the EU could develop a similar mechanism.

IFA proposes:

- The recommendations on market transparency and price reporting in the Agri-Markets Task Force (AMTF) Report to be supported by EU Commission legislation and be fully enacted.
- The designated Public Authority's remit be expanded to provide this information to the EU Commission.

EU High Level Forum for a Better Functioning Food Supply Chain

IFA proposes:

- The work of the EU High Level Forum for a Better Functioning Food Supply Chain would continue under the new EU Commission.

9. Fertiliser

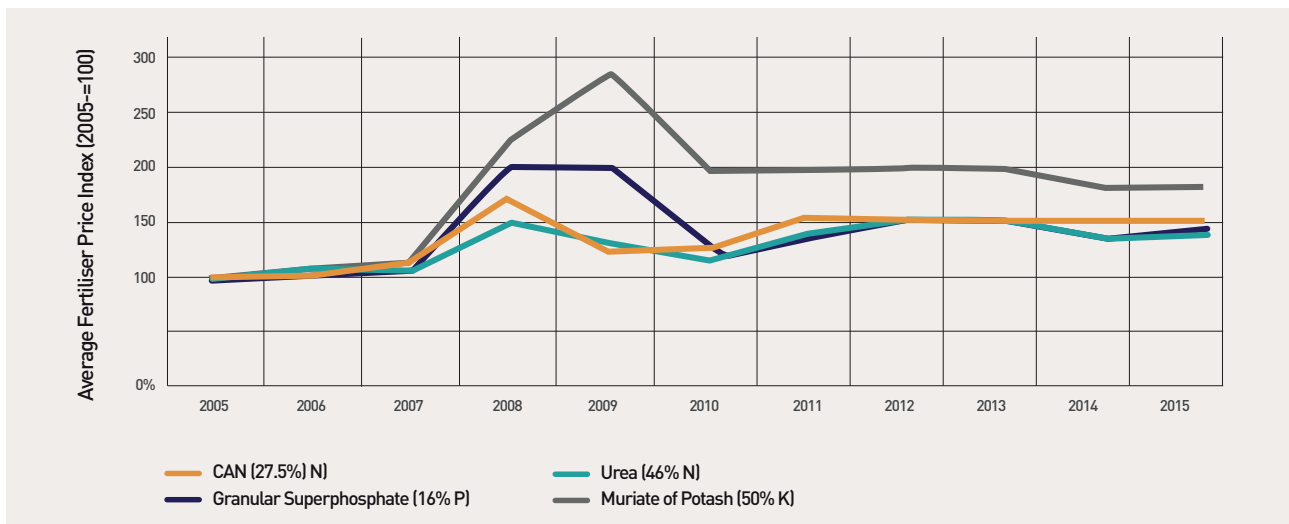
Fertiliser represents one of the biggest input costs for farmers. On tillage farms, it accounts for up to 40% of the variable cost of production. EU farmers are paying €1 billion too much for fertiliser⁷ through the imposition of combined Anti-Dumping (AD) measures and customs tariffs, costing Irish farmers €36m. Fertiliser prices were on average 60% higher for farmers over the period from 2005-2015⁸ (Figure 6).

In Ireland, fertiliser application rates were on average 36% lower for farmers participating in agri-environmental schemes, recognising less intensive agricultural systems.

IFA proposes:

- The EU Commission conducts a full Union Interest Test and explores options to redress farmers.
- The EU Commission drops the Urea Ammonium Nitrate investigation.
- The EU Commission terminates the AD measures on ammonium nitrate in the upcoming expiry review.
- The EU Commission must reduce the customs duties, currently at 6.5%, to zero.

Figure 6: Price index for fertiliser in Ireland



Source: Teagasc, Fertiliser Use Survey 2005-2015, (Central Statistics Office).

10. New Breeding Techniques (NBT)

The European Parliament must have a level playing field for all producers. The importation of GMO cereals into Europe and the circumvention surrounding the production of GMO crops sets a double standard and is not fair for EU growers. Decisions on NBT need to be supported with solid scientific evidence and with the support of the community. As the global population increases, there is a need to efficiently utilise our resources for food production.

IFA proposes:

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

7 The International Food Policy Research Institute (IFPRI) 2016 found at www.ifpri.org/publication/effects-import-duty-elimination-eu-fertilizer-market

8 Teagasc 2018: www.teagasc.ie/media/website/publications/2018/Fertiliser-Use-Survey--290518.pdf

11. Live Exports

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 cattle. This is vital in light of the severe income crisis currently affecting Irish beef 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.

IFA proposes:

- The EU must 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 must maintain current provisions for the export of live animals to ensure competition in the marketplace.
- The EU must protect existing supply routes without additional administrative or bureaucratic obstacles.
- The EU must support stakeholders to increase the ferry and lairage capacity for live exports, particularly for calves, without compromising animal welfare standards.
- The EU must support EU and diplomatic initiatives to get the international live export trade operating at capacity, to countries such as Turkey, Libya, Egypt and Algeria.



Joe Healy inspecting live export lairage facilities in Cherbourg, Spring 2019

12. Designated Natura Land

Almost 14% of Ireland's terrestrial area is either designated as SAC, SPA or NHA; farmers are guardians of these unique ecosystems. In these areas, support is needed as the restrictions on farming and development have a major impact on farm income, as well as the devaluation of land. Land abandonment and a deterioration of the habitats is also a concern. These areas contribute greatly to carbon sequestration and farmers should get recognition for this e.g. raised and blanket bogs.

IFA proposes:

- The re-opening of environmental NPWS farm plan schemes, which were closed during the recession. Particularly relevant to the Shannon Callows, Hen Harrier areas and hill land where there are severe farming and other developmental restrictions.

13. Animal Health

Farmers must be supported in meeting the challenge of antimicrobial resistance (AMR). VAT on non-oral animal medicines, including vaccines, is applied at the standard rate of 23%, costing farmers €10m on vaccines alone. For oral animal medicines a 0% VAT rate applies.

IFA proposes:

- The 0% VAT rate be applied as soon as is possible on adoption of the current proposed EU Council Directive (2006/112/EC).

The Delegated Acts for the new EU Animal Health Law and Veterinary Medicines Regulation set out legally binding criteria and controls on farmers relating to disease eradication and control programmes, such as TB and BVD. These criteria must make provision for variations in production systems and unique demographics within Member States.

IFA proposes:

- To protect farmers from additional costs and unnecessary controls more flexibility is required to allow scientifically based controls to be implemented at Member State level.
- That farmers have continued access to all the veterinary medicine products currently available, including those licensed through the UK, without any additional costs or bureaucracy associated with changes to categorisation of products, supply routes and prescribing criteria.

14. EU Tariff Rate Quota (TRQ)

TRQs are trade instruments relating to imports and apply to countries importing goods. The imports can be within a negotiated quota (volume), where there are no/reduced duties or outside a quota, where full duties apply.

There is a proposed amendment to TRQs for poultry. The proposed changes would result in EU poultry traders needing to import large amounts of individual products (e.g. breast, wings, 5th quarter, etc.) to get a licence. This would be very difficult for an EU SME to achieve on one category of product. Currently, this is allocated at the level of poultry (which combines all individual products).

IFA proposes:

- That MEPs must oppose proposed changes to the EU Directive on TRQs for poultry.

15. EU Sheep Meat Forum

Irish livestock farming is extensive in nature, promoting biodiversity and preventing land abandonment. It is a low-income sector essential to environmentally friendly land management on marginal lands, hill and mountainous areas.

IFA proposes:

- Supporting the key recommendations from the EU Sheep Meat Forum:
 - Increased targeted direct payment of €30/ewe funded by EU and national resources.
 - To ring fence significant EU funding for a strong sheep meat communications and promotions programme.
- Cost of EID tagging (imposed through Council Reg. 21/2004) must be reduced/subsidised and paperwork minimised through compulsory Central Points of Recording at all factories and marts. One single EID tag for store lambs at marts.
- No increase in the EU meat import quota from third countries in new trade deals and in light of Brexit. TRQs must be reallocated on a traditional use, no loss/no gain basis.

16. Licencing Plant Protection

The EU re-registration process for licencing plant protection products has resulted in tillage farmers losing a number of key products. Also, other key active ingredients are currently under review. Decisions on use of products such as *Glyphosate* must be based on strong scientific evidence. The loss of key plant protection products will undoubtedly compound the problems faced by the horticulture and tillage sectors.

IFA proposes:

- The removal of differences in environmental and regulatory controls between EU producers and non-EU importers such as the Ukraine, it is not acceptable.
- Parity of treatment in licencing of products with the introduction of an equivalence in standards, for products imported into the EU.
- The review of TRQs based on the licencing of imported grains, particularly maize, this unequal treatment undermines Ireland's native cereal sector e.g. barley.

17. Country of Origin Labelling

Article 26(2) of Regulation (EU) No 1169/2011 sets out the obligation to indicate the country of origin or place of provenance of meat. IFA welcomes the Country of Origin Labelling (Cool), which will come into effect on all products containing meat from 1st April 2020. However, this does not include wholesale and loose meat products. Many outlets are currently not required to show the *Cool* labelling on foods sold, a particular issue in the foodservice sector.

White protein meats are most affected. The origin of pork, bacon and poultry meat is heavily influenced by economics rather than providence. Clear and accurate information must be provided to the consumer.

IFA proposes:

- Further legislation be introduced to include wholesale and loose meat products.

18. 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 2) 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, Brexit, 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 eleven 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. IFA President, Joe Healy, is currently the elected COPA 1st Vice-President. Joe Healy also holds the COPA seat on the *EU High Level Forum for a Better Functioning Food Supply Chain*. He is the only European farmer representative on this group. The Chairmen of IFA's National Committees and expert 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.

19. IFA in Brussels Committee List

Table 2: COPA Working Parties and EU Civil Dialogues

COPA Working Parties:
• Praesidium
• POCC: Farm Organisations Monthly Meeting
• Ad Hoc WTO
• CAP
• Direct Payments and Greening
• International Aspects of agriculture
• Foodchain
• Horses
• Fruit and Vegetables
• Animal Welfare
• Bioeconomy – Renewables – Fertilisers - Inputs
• Promotion – Quality
• Feeding stuffs
• Potatoes
• Risk Management & Social Insurance
• Tax and Legal Issues
• Women’s Committee
• Research and Innovation
• Communications
• Organic Farming
• Cereals and Oilseeds
• TASK FORCE on:
– Brexit
– Fertilisers
– Risk Management
– African Swine Fever INFO
– Technology in agriculture – precision farming

EU Civil Dialogues:
• CAP
• Direct Payments and Greening
• Cereals/Oilseeds and Proteins
• Dairy (Milk)
• Beef meat
• Pig meat
• Sheep/Goat meat
• Eggs and Poultry
• Environment
• Rural Development
• Forestry
• Fisheries and Aquaculture
• Social dialogue / GEOPA
• Pigmeat forecast group
• Eggs and Poultry forecast group
• International Aspects of agriculture (Trade)

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Liam MacHale and Sarah Lucas, Brussels office

Local Government Elections

Project Ireland 2040 represents Ireland's growth and development strategy for the next two decades. Local government will play an important role in the delivery of this strategy. 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.



1. Services for Rural Dwellers

Rural transport

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 proposes:

- The roll-out of the Local Link evening service, operating 12 months of the year in each local authority area.
- The introduction of services such a ridesharing, grocery delivery and taxi transportation network in rural areas, similar to the Uber model.

Rural roads

The Local Improvement Scheme (LIS), which was re-opened in 2017, is 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 proposes:

- Each local authority should publish LIS expenditure on a quarterly basis each year and also set out their LIS awareness campaign, to maximise uptake.
- LIS funding be fully restored to pre-2008 levels.

In relation to regional and secondary roads, some of these roads are often impassable after periods of severe weather, such as in spring 2018. Despite this, the Department of Housing, Planning and Local Government collects over €1bn in road tax.

IFA proposes:

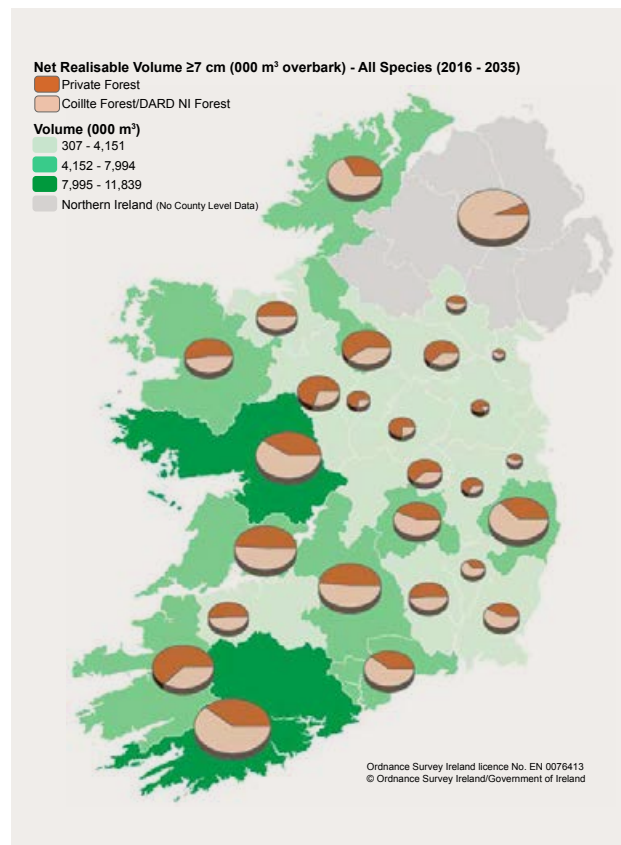
- That local authorities work with Government departments and develop a national strategy. This must include additional funding from the road tax paid by motorists, to ensure rural roads are properly maintained.

Production in the forest sector is forecast to increase from 3.1m m³ in 2017 to 7.9 m m³ by 2035, with almost all of the additional volume coming from small forests located on farms. Figure 7 shows the volumes of timber forecast to be harvested per county between 2016 – 2035 (All Ireland Roundwood Production Forecast 2016-2035).

IFA proposes:

- The introduction of a timber transport scheme to provide additional funding to local authorities to invest in the rural road network.

Figure 7: Forecast Irish timber production to 2035



Source: COFORD, 2016. All Ireland Roundwood Production Forecast 2016-2035.

Broadband: availability and access

Farm families and rural businesses require access to a fibre broadband service that makes their lives better, lowers the cost of doing business and lessens the regulatory burden that they face. Government must deliver on their commitment around the National Broadband Plan (NBP) for rural Ireland.

IFA proposes:

- An accessible and affordable 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 must be completed in a timely fashion and must have hard 'completion time frames' with penalties.
- The preservation of the Universal Service Obligation (USO) with the existing and new operators.
- Government should consider a voucher system for temporary (wireless) solutions while NBP qualified premises wait for fibre.

Tyre recycling

Support for the recycling of waste tyres is welcome. The collection and recycling of tyres represents good value for money at €1.50 per tyre.

IFA proposes:

- Government make additional funding available for four sites which are already contracted for.

2. Animal Health

Large animal veterinary services

The availability of competitive large animal veterinary services nationally is a major concern for farmers.

IFA proposes:

- Government must urgently carry out a national review of all components of large animal veterinary services. This must identify and address the issues contributing to the growing shortage of large animal veterinary services.

The Regional Veterinary Laboratories

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 this role is becoming more important.

IFA proposes:

- Government provides funding to upgrade all existing Regional Veterinary Laboratories and enhances the services provided to farmers.

TB programme

The current TB eradication programme is placing an unfair and disproportionate cost burden on farmers throughout the country. Eradication of the disease within the shortest feasible timeframe must be the objective. However, this cannot result in additional costs or unsupported controls on farmers.

IFA proposes:

- The Department of Agriculture provides resources to fully compensate and support farmers in implementing the controls deemed necessary to achieve eradication of TB.
- The TB Forum must address concerns and issues raised by farmers. Currently, this is not a functioning forum.

3. Water

The majority of farm families and rural dwellers provide and pay for their water supply either to Irish Water, their group water scheme or are self-sufficient through a private water source on their property. In addition, farmers have also provided access to facilitate local water supplies. Local authorities must act to support farmers to protect waters and to compensate them for losses incurred.

IFA proposes:

- Where farmers incur yield and income losses through compliance with regulations in the provision of water to local communities, local authorities must work with Irish Water provide for compensation for these restrictions e.g. exclusion zones.
- A review of the duplication of water quality inspections.
- An end to unannounced inspections and support for the work of the ASSAP⁹ water quality programme, by working with farmers to deliver compliance and build community capacity to address water quality challenges.

4. Rural Planning and County Development Plans (CDP)

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

IFA proposes:

- Each CDP acknowledges the importance of farming.
- The inclusion of a chapter in each CDP supporting the development of farm scales 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.

5. Rates on Farm Buildings & Agricultural Land

IFA proposes:

- The exemption applying to farm buildings in the Valuation Act 2001 and the 'relevant property not rateable' list continues as is, in the Valuation's Office revaluation review process.

6. Flooding

The Minor Works Scheme to alleviate flooding is too onerous, leading to a significant underspend in many local authority areas.

IFA proposes:

- The Minor Works Scheme is simplified with a cost/benefit analysis, which more appropriately assesses farmland.
- Local authorities ensure maximum draw-down of funds available.

7. Local Community Development Companies (LCDC)/Leader

The administrative process of Leader/LCDC has led to a serious underspend of vital EU CAP funding. The operational process of Leader/LCDC must be addressed and reviewed.

IFA proposes:

- To support a review of LCDC/ Leader process to improve uptake of funds and to ensure that vital EU Leader funds support farmers, rural dwellers and communities.

8. Walks Scheme

IFA welcomes the recent re-opening of the Walks Scheme with an additional €2m, which will double the number of walks from 40 to 80.

IFA proposes:

- The additional allocations in Budget 2018 must be fully spent in 2019.

9. Rural Social Scheme (RSS)

The Rural Social Scheme is a vital support to low income farmers, benefiting farmers nationally.

IFA proposes:

- Changes to the eligibility criteria for the RSS to include low-income farmers who are not currently eligible for Farm Assist.

10. 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 proposes:

- Amending litter legislation, which currently places the illegal 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.
- County Councils publish monthly reports of anti-dumping enforcement actions and prosecutions.

11. Recreational routes

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.

To-date, consultation with landowners has been haphazard and, in some instances, nonexistent. 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, Tourism and Sport) and develop a standardised approach of engagement with landowners that all local authorities must follow.

IFA proposes:

- 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.
- The services of a professional agronomist be provided to each landowner impacted, to assist in understanding and resolving concerns, at no cost to the landowner.
- Any losses incurred, such as exclusion from farm schemes and BPS losses, must be fully compensated.
- The appointment of a Project Liaison Officer by Local Authorities, to hold community clinics to address queries and concerns.



Joe Healy with Garda Commissioner Drew Harris

12. Crime

Rural Crime is a major concern to farmers and members of the rural community. IFA believes the proposals below need to be addressed to give greater public confidence in the policing of rural areas.

IFA proposes:

- 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.
- There are no territorial issues with Gardaí divisional boundaries. The nearest vehicle or Garda must respond to the request for assistance.
- 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, similar to the North Dublin Rural Crime Patrol.
- The development of Gardaí national policy on trespass and illegal hunting in the handling of victims and perpetrators of these crimes.

13. Responsible Dog Control

The problem of dogs attacking sheep flocks is very common. Based on feedback from sheep farmers, IFA estimates that there are 300-400 dog attacks annually on sheep flocks. Up to 4,000 sheep are killed or injured, inflicting horrific damage from an animal welfare and economic perspective. In 2017, local authorities issued 200,282 dog licences. It is estimated many more hundreds of thousands of dogs remain unlicensed.

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 proposes:

- Improved dog warden services 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.
- Government provides funding to re-run the very successful TV advertisement campaign on responsible dog ownership from the 1980s. The key message was "Keep your dog under control. Running free he can be a killer." Education and awareness are essential for more responsible dog ownership.
- One central authorised database for micro-chipping and dog licencing to be under the control of one Government Department.

Annex I

Next steps: MFF and CAP process 2021-2027

The next steps in the CAP process are linked with the decision of the overall EU Budget the MFF. The decision on the MFF, while planned to conclude by end of 2019 it is expected to rollover to mid-2020. The negotiations on the CAP regulations will begin towards the end of 2019 with the appointment of the new European Parliament and Commission. Negotiating the MFF package requires unanimity in Council with consent of the Parliament.

The main decision-making institutions in the CAP process are the EU Commission, and particularly the Commissioner for Agriculture, the Council of Ministers with its rotating Presidency¹ and the European Parliament.

Each institution has different roles, all three must agree a common position through consensus before the proposed CAP regulations, published by the Commission, becomes legally binding. This is called the trialogues process. The trialogues will begin towards the end of 2019 and may take 6 months to conclude.

The Parliament has enhanced power over the CAP since 2010, under the Lisbon Treaty. The Commission is headed by a College of Commissioners, and it is its prerogative to propose new legislation. Its Directorate-General for Agriculture and Rural Development (DG AGRI) leads this process, through management committees. The committees serving the Council include the Special Committee on Agriculture (SCA) and two Committee of Permanent Representatives (COREPER).

The Commission began this process by publishing proposed regulations, which define the legislative framework of the CAP for the period 2021-2027. The EU Commission published three regulations on the 1st June 2018: The Strategic Plans, the Single Common Organisation of the Markets (CMO) and the Horizontal regulation.

The Strategic Plans:

- Set out the general and specific objectives that must be achieved by interventions designed by Member States.
- The plans are designed through conducting a needs analysis and a SWOT analysis in each Member State.
- The common obligations are set out under conditionality, with no “backsliding” at national level, designed to increase the level of ambition in achieving the objectives of the CAP primarily concerning the environment and climate.

The CMO:

- For agricultural products, it provides for market measures under the CAP.
- This regulation is concerned with market disturbance, market distortion and quality schemes including geographical indications (GIs).

Horizontal Regulations:

- Supports the current structure of the CAP as a two-pillar mechanism with a shift to a performance-based model.
- This regulation provides for the general provisions for checks and penalties.
- This includes regulation on financing, management and control systems, clearance processes and conformity procedure.

These proposed regulations were published on 1st June 2018. Since then, the Parliament has considered these proposals through the Agricultural Committee (COMAGRI) and the Environment Committee (ENVI Committee). The Parliament has engaged with the EU Commission in particular receiving representation through technical presentations from DG AGRI. In the Parliament, three rapporteurs were selected to write a report, reflecting the views of the Committees on each of the proposed Commission regulations.

¹ Six month rotations: Romania/Finland 2019; Croatia/Germany in 2020; Portugal/Slovenia in 2021.

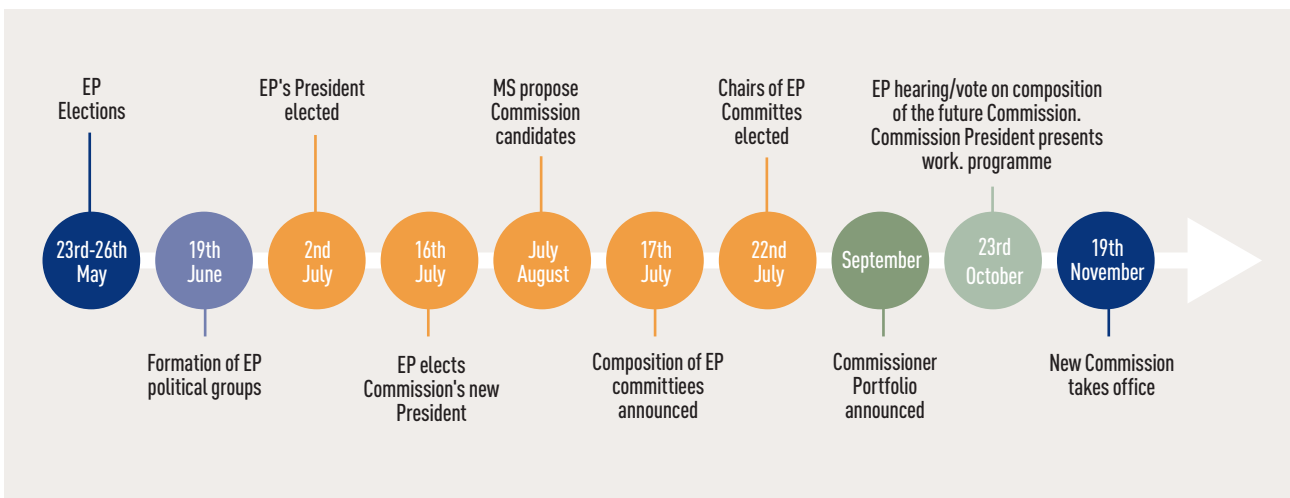


Both committees consider these reports and proposals in detail, putting forward proposed changes through compromise amendments (CA) on specific areas of the regulations. COMAGRI takes the lead in these discussions, while also taking considerations from the ENVI Committee through discussions and through a voting procedure. The ENVI Committee voted first. The Parliament ENVI Committee adopted its opinion on the Strategic Plans on the 14th February 2019 with 42 in favour, 14 against and three abstentions.

COMAGRI takes this opinion for consideration before they vote on the same regulation. The first vote was on the 1st April on the CMO regulation; on the 3rd April a vote was held on the Strategic Plans and on the 8th April a vote on the Horizontal Regulations was passed. These votes are not legally binding. The votes are put to Plenary, after approval at Plenary they become the opinion of the Parliament. The current Parliament (2014-2019) will not now vote on the COMAGRI opinion at Plenary. This will now fall to the newly elected Parliament (2019-2024). These provide a mandate for the leading Committee (in this case COMAGRI) to start the trilogues. The three rapporteurs make representation on behalf of the Parliament at the trialogue stage.

The last Plenary in the current Parliament is the 15th April. After the election of a new Parliament the Plenary of the EP will meet in July (week of 2nd July) and will elect its President. On the second July Plenary (week of 15 July) they will elect the future President of the Commission.

Figure 8: Timeline for European Parliament and Commission



Annex II

Impact of previous CAP reform (2014-2019)

Convergence is affecting many Irish family farms. To highlight this IFA have used an example of a suckler and sheep farm with owned entitlement value of €16,000 in 2014. The impact of the last reforms, and including convergence, to the end of 2019 equates to a 16% cut for this farmer, to €13,488².

40 ha farm

- Value of entitlement at €400/ha 2014 (including greening)
- Total BPS and Greening: €16,000
- 30 suckler cows (plus followers)
- 150 ewes
- 1.55 lu/ha

	2014	2015	2016	2017	2018	2019
BPS	16,000	10,300	10,054	9,809	9,577	9,366
Greening	-	4,532	4,425	4,316	4,214	4,122
Total	16,000	14,832	14,479	14,125	13,791	13,488

- €16,000 in 2014 to €13,488 by end of 2019.
- This represents cuts in payments of 16%.
- In the current CAP reforms 2021-2027, more convergence cuts are proposed for farmers.

2 This was calculated using the DAFM calculator found at: www.agriculture.gov.ie/capdirectpaymentsinformationcentre/

NOTES



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