Macra na Feirme

Draft Scoping Report for the Environmental Assessment of Ireland's CAP Strategic Plan 2023-2027

13th April 2021

To whom it may concern,

Please find below a full response outlining the Macra na Feirme's position in regards to Public Consultation on draft Scoping Report for the Environmental Assessment of Ireland's CAP Strategic Plan 2023-2027.

We appreciate the time taken to consider our position. The value of generational renewal and greater number of young farmers and young farm owners to the change in practice and improvement in environmental outcomes is significant. This has already been demonstrated by the larger uptake by young farmers in investment support leading to reduced loss of nutrients to air and water. This demonstrates the need for generational renewal should be a significant consideration in both the social and environmental

Yours Sincerely

[redacted]

Macra na Feirme

INTRODUCTION

One of the most significant factors in both farm viability and environmental sustainability through wise use of resources remains the age and education level of primary producers. Generational renewal has become a priority for numerous iterations of CAP programmes under both Direct Payment and under the Rural Development Programme due to the every increasing age demographics of farming. Despite this successive CAP programmes have failed to consider the impact of various interventions and mitigate where there are elements of CAP which restricts land access, disincentives succession and places unnecessary barriers to entry into schemes for young farmers and new entrants.

An SEA must consider the various socio-economic factors that are influenced or directly caused by CAP. These have a direct influence on the take up of more efficient farming practices, better nutrient management and other environmental measures. The largest of these remains the average age of farmer and the need for strong incentives for entrants into farming and advantages for long term system change which can only be achieved by ensuring age of participant is considered in all schemes.

ARE THERE OTHER PLANS OR PROGRAMMES THAT SHOULD BE IDENTIFIED AND REVIEWED AS PART OF THE STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS?

Land mobility is of significant important in terms of the economic viability, social structure and often overlooked the environmental impact of farming. Reduced land availability results in greater competition for land available particularly amongst younger farmers and new entrants. The most significant insight into the lack of market access and the success of succession and partnership arrangements facilitated by the Macra na Feirme Land Mobility Service in the Land Mobility Report 2019 (available here: http://landmobility.ie/wp-content/uploads/2019/07/LAND-Mobility-2019-Report.pdf). This service has facilitated 521 arrangements encompassing 47,000 acres, of these collaborations delivered an increase in farm viability with a 41% increase in land productivity outside of increase in scale.

IS THERE ADDITIONAL INFORMATION THAT NEEDS TO BE CONSIDERED AS PART OF THE BASELINE DATA?

The Teagasc National Farm Survey 2019 Sustainability Report (available here: https://www.teagasc.ie/media/website/publications/2020/NFS-2019-Sustainability-Report.pdf) contains data on the social sustainability of the various agricultural systems, including that on a three-year rolling average basis the percentage of all farms with a high age profile actually increased between the start and end of the study period (25% to 32%). With dairy farms tending to have the lowest age profile across all farm systems compared to other systems which tend to be double or treble the rate.

The recently published EU Commission working document “Evaluation of the impact of the CAP on generational renewal, local development and jobs in rural areas {SWD(2021) 79 final}” should also be considered (available here:

https://ec.europa.eu/info/food-farming-fisheries/key-policies/common-agricultural-policy/cmef/rural-areas/impact-common-agricultural-policy-generational-renewal-local-development-and-jobs-rural-areas_en). This document outlines the key findings related to generational renewal. Identifying numerous barriers to entrance which must be considered along with CAP. This demonstrated that the current CAP has been insufficient to address demographic decline and so the concerns around average age must be addressed through all schemes designed to assist young farmers. The report did identify however that current supports significantly improved the economic viability of farms once succession or partnership is in place.

In addition, a significant indication of the impact of young farmers impact upon farming is their participation in environmental schemes such as GLAS and investment support for environmental mitigation technology such as low emission slurry spreading. Information collected by DAFM on the uptake of investment support such as TAMS for Low Emission Slurry Spreading as percentage of the total allocated under this heading would be of use.

DO YOU CONSIDER THAT THE RANGE OF ISSUES COVERED IS APPROPRIATE?

Within the scoping exercise there are a handful of references to encouraging young farmers but no reference to Generational Renewal. Succession planning and step back/retirement options also merit serious consideration to complement the recommended Rural Development Interventions of installation of young farmers and rural business start-up.

With just 12% of Irish farms owned by women, while women make up 27.2% of the farm workforce, the inclusion of female farmers and gender is necessary part of generational renewal and vital to the future of rural areas and so must be included.

ARE THERE ANY CHANGES THAT IN YOUR CONSIDERATION SHOULD BE MADE A) TO THE PROPOSED ENVIRONMENTAL OBJECTIVES AND B) TO THE GUIDE QUESTIONS INCLUDING THE CONSIDERATION OF ALTERNATIVES?

Under Population and Human health, Macra na Feirme would recommend the strengthening of the wording "*Encourage younger farmers participation?*" to increase the specification to "Increase the number of young farmers in ownership of farms?" along with the addition of a question "Increase in the number of young managers?" and "Increase the number of farm partnerships?". Young farmers in this would be defined as under 35 in line with the information provided by EU Farm Structure Survey last carried out in 2016.

The reason for these changes is to establish a clear impact, driven by data on the impact of CAP 2023-2027 on generational renewal. While this is a priority for CAP much of the assessment of the current situation and the future evolution has lacked a significant evidence base.

DO YOU HAVE FURTHER SUGGESTIONS REGARDING THE SCOPE OF THE STRATEGIC ENVIRONMENTAL ASSESSMENT AND ITS PROPOSED ASSESSMENT OF THE CAP STRATEGIC PLAN?

The impact of land accessibility on the intensification of farming as a result of the loss of farmland being actively managed due to CAP interventions must be considered in any assessment.