



Talamh Beo's Submission re DAFM's CAP Strategic Plan 2023-2027 consultation on Proposed Interventions.

Format and Contents: this submission is divided into four parts

- 1. Talamh Beo consulted its members via survey regarding the Stakeholder Consultation (Section 4) and the 6 Key Questions to be addressed. The content of these two sections overlapped to a large degree, so our responses follow 5 of the 6 questions with additional input relating to areas of Section 4 where appropriate.**
- 2. Question 6 of the Key questions relates to 'should the DAFM, and if so how, incentivise Gender Equality in the CAP'.**
- 3. Section 5, which covers the Proposed Intervention Outlines under Pillar 1 (5.1) and Pillar 2 (5.2).**
- 4. What Talamh Beo would like to see in Ireland's CAP Strategic Plan 2023 -2027. This includes Talamh Beo's Local Food Policy Framework and a recommendation for a Rights-Based CAP Strategic Plan.**

Contact:

**info@talamhbeo.ie
John Brennan (0872703603)
Bridget Murphy (0876836655)
Fergal Anderson (0877806155)**

Table of Contents

PART 1: 5 of the 6 DAFM Questions and S4: Stakeholder Consultation	4
Introduction	4
Our stakeholder consultation methodology.....	4
Our stakeholder consultation composition.	4
Stakeholder approach – our vision	5
Consultation Question 1	8
Consultation Question 2	8
Consultation Question 3	11
Consultation Question 4	12
Consultation Question 5	12
PART 2: The 6 th DAFM question, S4 stakeholder consultation and Gender Equality.....	14
Consultation Question 6	14
PART 3: Additional Observations on the draft CAP plan Pillar 1 & 2	19
5.1 Pillar I	19
(1) Definitions:	19
(2) Conditionality	21
(3) Basic Income Support for Sustainability (BISS)	22
(4) Complementary Income Support for Young Farmers (CIS-YF)	22
(5) Eco-scheme	23
(6) Apiculture	25
(7) Sectoral Intervention in the Fruit and Vegetables Sector	25
(8) Coupled Income Support for Protein Aid	26
(9) Complementary Redistributive Income Support for Sustainability (CRISS) Frontloading	26
5.2 Pillar II	27
(1) Agri-Environment Climate Measure (AECM).....	27
(2) Agri-environment Climate Training	27
(3) Organic Farming Scheme.....	27
(4) Areas facing Natural Constraints (ANC).....	29
(5) Producer Organisations in the Beef and Sheep Sector.....	29
(6) Suckler Carbon Efficiency Programme (7) Dairy Beef Welfare Scheme (8) Sheep Improvement Scheme	29
(9) European Innovation Partnership (EIP-AGRI) Operational Groups	30
(10) On-farm Capital Investment Scheme	30
(11) Continuous Professional Development (CPD) for Advisors	31
(12) Knowledge Transfer Programme.....	32

(13) LEADER Programme	32
PART 4: Talamh Beo’s Vision: A Local Food Policy Framework and A Rights-Based CAP Strategic Plan.....	32
(A) A Local Food Policy Framework	32
Introduction	32
What we need	33
(1) Institutional recognition for Local Food Producers	33
(2) A Local Food Policy framework.....	33
(3) A multi-department, integrated approach to reviving and climate proofing our rural communities:.....	34
(B) A Rights-Based CAP Strategic Plan.....	35
Introduction.....	35
APPENDIX 1: Talamh Beo’s Local Food Policy Framework (2021)	37
APPENDIX 2: What the UNDROP provides for Family Farmers and People Working in Rural Areas.....	46



Talamh Beo members in Dublin October 2019 – Gender and Generational Renewal are not problems for agroecological farming. Accessing farm supports under the CAP and being recognised as a farm social partner from an agroecological perspective are.

PART 1: 5 of the 6 DAFM Questions and S4: Stakeholder Consultation

Introduction

Our stakeholder consultation methodology

Talamh Beo actively engages members to make decisions and contribute substantively to policy and submissions. We believe this to be part of the democratic process. Whilst we would have preferred a longer consultation period which would have allowed more robust discussion of, for example, the shape of eco-schemes and AECM's, our members consensus is reflected in our answers.

Our stakeholder consultation composition.

- Talamh Beo has male and female members who are farmers, landowners and consumers. Diagram 1 indicates the composition of the group who contributed to this submission.
- Our age demographic (see contents page picture for reference) confirms our vision and approach resonates with all age groups, reflecting the fact that there are many young people interested in agriculture that is about agroecology and regeneration of ecosystems, care and well-being of farmers and communities.
- Our Core Group (we work with a flattened structure) is 50/50 female / male, and women are as active as men in leadership and policy. We mainstream gender in aspects of our work.
- Diagram 2 indicates the status of the gender composition as we recognise that farmers farming on their own tend to be more exposed to vulnerabilities (unable to access credit to allow them to participate in schemes like TAMS, carry a heavier physical and emotional burden over times like calving and lambing where they don't have the support of a partner or family to help, etc). These vulnerabilities are compounded when the farmer is a single parent, widow or spinster, farms with a disability etc.

Diagram 1: Gender breakdown of surveyed responses

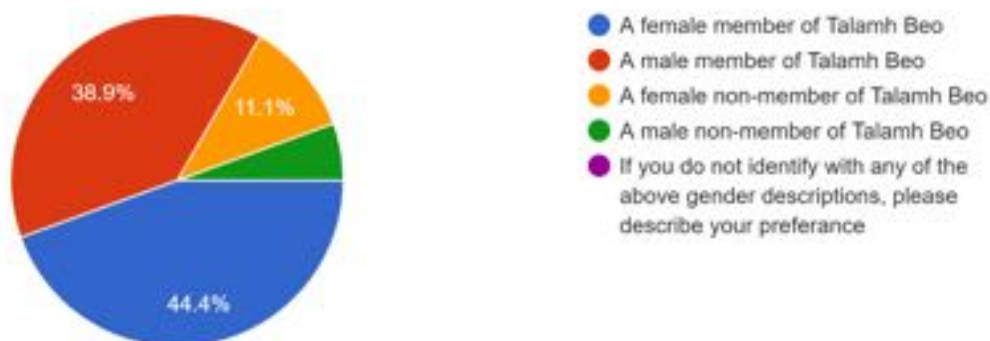


Diagram 2: Gender and status (single or partnered) of responders

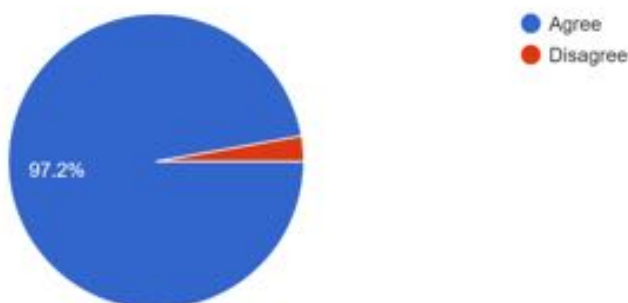


Stakeholder approach – our vision

Talamh Beo is a new farming organization in Ireland which aims to ensure a living landscape where people and ecosystems can thrive together. We support the principles of **Food Sovereignty**, which provides a framework for the democratic reorganization of agricultural and food systems - putting farmers, the land, people and communities at the centre of decision-making.

Talamh Beo supports a **transition to Agroecological farming systems**; we would like to see the CAP move away from a focus on industry, agribusiness, growth and global markets towards a focus which instead secures future livelihoods for family farms, builds resilient and thriving communities and ecosystems and supports food sovereignty, care and well-being.

Figure 3: Talamh Beo members position on a strong focus on the social aspect, especially the farmer’s care and well-being, in the new CAP.



Irish citizens want to live in a thriving environment and have access to high quality food produced by farmers earning a fair wage whilst regenerating ecosystems and soils. This food should be affordable to all people, including the most vulnerable and marginalized communities in our society, and should move as directly as possible from farmers to consumers without the use of intermediaries.

What is Agroecology?

Agroecology encompasses a broad spectrum of agricultural practices based on ecological principles like building life in the soil, recycling nutrients, the dynamic management of biodiversity and energy conservation at all scales. Agroecological farming is embedded and adapted to the ecosystems, communities, and soils of the places where it is practiced, incorporating a social and geographical element which makes Agroecology different according to people and place. Permaculture, Regenerative farming, Agroforestry, Organics and Biological farming can all be considered part of the broad family of Agroecological land use practices.

The Common Agricultural Policy is by far the most important policy framework that exists to achieve these goals. The CAP Strategic Plan has the potential to transition Irish farming from a system based on mass production for export markets to one which regenerates our land, ensures livelihoods and fairness for all farmers and meets the challenges of climate change.

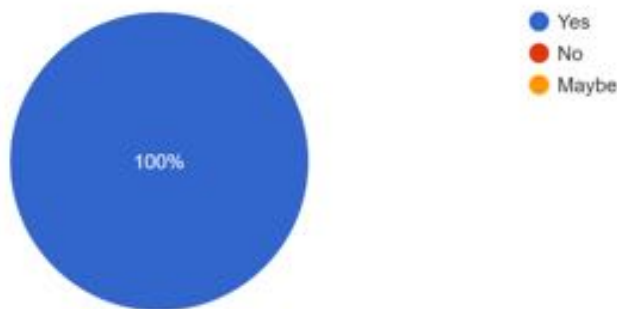
Talamh Beo represents farmers and citizens who are working towards this end.

We believe at present that Agroecological farming and its associated practices (organic, permaculture, biological, regenerative farming, agroforestry etc) are not, and have not been, adequately represented in decision making around food and agriculture policies in Ireland and this needs to change. Talamh Beo requests to be consulted and participate in any current and future policy and decision making that affects them as farmers and to bring the perspective of agroecological farming to the discussion and debate.

We recommend the following intervention:

- *Talamh Beo requests the Minister (DAFM) to be invited to represent and champion agroecological (regenerative / permaculture / holistic / biological / organic farming) at agricultural forums as a social partner.*

Figure 4: Talamh Beo members position on whether they agree with Talamh Beo asking the Department to be invited to represent and champion agroecological (regenerative / permaculture / holistic / biological / organic farming) at agricultural forums as a social partner.



As the CAP Strategic Plan process to date has excluded the voice of the agroecological perspective, we would also request to retrospectively contribute to those processes, including: the needs assessment, the SWOT analysis and the design of interventions

We recommend the following intervention:

- *Talamh Beo have the opportunity to be consulted and their input fed into the CAP strategic plan processes including: the SWOT analysis, the needs assessment, the design of interventions especially around eco-schemes, AECM's and gender.*

Figure 5: Talamh Beo members position on whether Talamh Beo should have the opportunity to be consulted and their input fed into the CAP strategic plan processes including: the SWOT analysis, the needs assessment, the design of interventions, etc



Consultation Question 1

Should Ireland implement capping at an effective rate of €66,000 or €100,000, or at a rate in between?

Talamh Beo Answer: Talamh Beo would like to see capping at a rate lower than €66,000. We believe the CAP budget should be providing Basic Income Support Supplement to many family farms rather than fewer industrial model farms.

Figure 6: Should Ireland implement capping at an effective rate of €66,000 or €100,000, or at a rate in between?

We added in an extra option – lower than €66,000



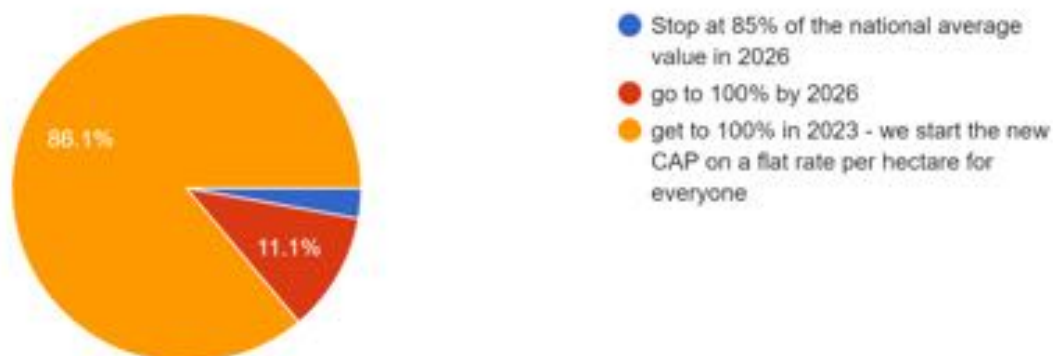
Consultation Question 2

Should internal convergence stop at 85% of the national average payment entitlement value in 2026, or should it go to a higher percentage?

Talamh Beo Answer: 100% convergence by 2023

Figure 7: Should internal convergence stop at 85% of the national average payment entitlement value in 2026, or should it go to a higher percentage?

We add in an extra option – get to 100% convergence in 2023, we start the new CAP on a flat rate per hectare for everyone



Justification:

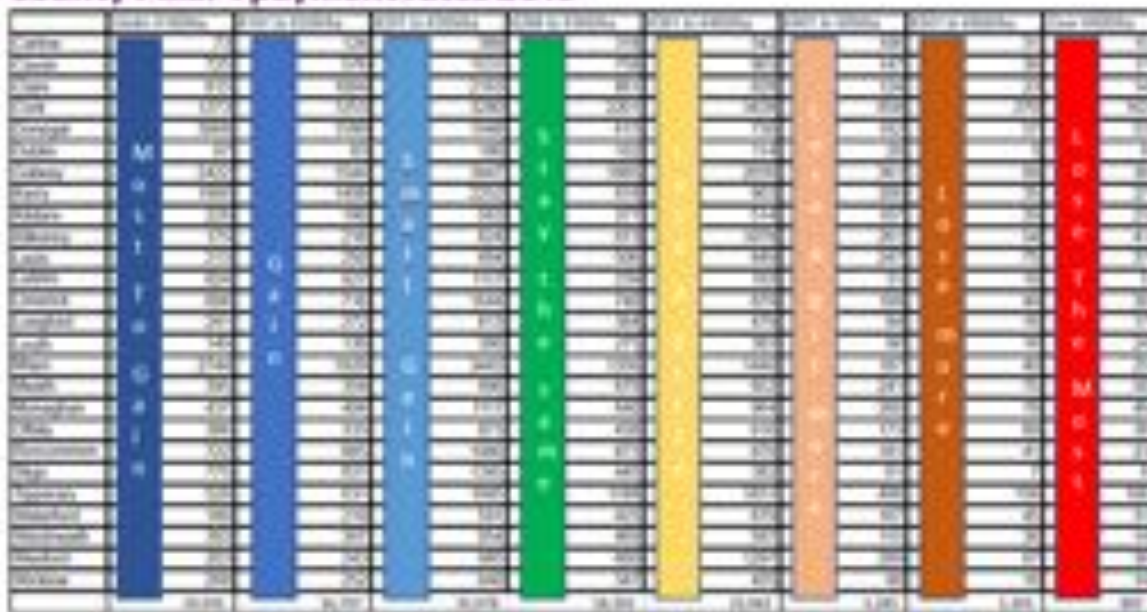
The amount of money each farmer receives per hectare of land is not equal. It is based off a snapshot of productivity in 2000, 2001 and 2002. This was deemed unfair early on, especially as every farmer has to deliver GAEC's with wildly different amounts (eg. some farmers were getting €27/ha and others getting €900/ha to deliver the same work under the GAEC's). The 2014 CAP reform aimed to bring all farmers to an equal amount per hectare. More than half the 27 EU countries gave equal payments straight away from 2015, some chose regional payments while others chose a process of convergence designed to bring down the top payments and rise the low payments. This convergence would happen over several years to make it easier for those getting higher payments to adjust to losing money gradually.

Ireland has still not gotten to equal payments for equal delivery of regulatory requirements. Brussels wants to see our Strategic Plan deliver 100% convergence by 2027 latest. Ireland (through the main farming organisations) is arguing for 85% convergence by 2027. 'Equality is aspirational' is what we hear some farming organisations say. Farmers having to lose some of their payments will see them and their families experience hardship we hear too. Their farms will no longer be viable without their unfair advantage. If this is the case, one needs to ask how viable / sustainable the current export orientated industry model truly is if it needs to be held in place with inequality. It also needs to be noted that some 72 000 farmers will benefit from fairness, mostly up and down the western part of the Island.

We would like to see the CAP starting in 2023 doing so at full convergence – a flat rate per hectare for everyone. We believe in equal pay for equal work. We believe in equal opportunities and equal access to resources. We believe unfair payments have allowed certain sectors to get a lot of investment and others to get little. Given there will be greater environmental and climate actions required in the new Plan, we want everyone to have the same resources / amount of money per hectare to deliver these actions.

Figure 8:

County Pillar 1 payment rates 2019



The first three columns will see an increase as they move towards the average payment, fourth column will stay the same, the fifth will lose a bit and last three will lose more. Note: 72,710 farmers stand to gain; 38,392 stay the same; 23,342 lose a bit; and 7,575 lose more. The long road to equality in payments benefits the few at the expense of the many.

It's not like those who get higher payment rates are producing more either. 2017 DAFM figures show the value of entitlements and how many livestock units were kept – and it is clear to see in the table below that those getting between 100 and 200 euro per ha are carrying the same capacity (and thus similar numbers going into the food chain) as those getting over 1,000 euro per ha. Similarly, those getting between 300 and 400 euro per ha are carrying the same stocking density as those getting 600 to 800 euro per hectare. This is not fair or justifiable. It is time for a single flat rate per hectare.

BPS value per ha in Euro	LSU per ha	BPS value per ha in Euro	LSU per ha
0-100	0.75	400-600	1.7
100-200	1.19	600-800	1.6
200-300	1.6	800-1000	1.26
300-400	1.77	over 1000	1.18

Consultation Question 3

Should Ireland go beyond the 10% of direct payments to redistribute from larger to smaller or medium-sized holdings? Or should Ireland seek to use the derogation to reduce the percentage?

Talamh Beo Answer: We agree with frontloading. We understand 10% is the minimum recommended and believe there is scope to go higher, and that this option should be investigated. We would like to see modelling figures on 15 and 20%. Talamh Beo members feel that to frontload well on the first 5 or 10ha will encourage more small, diversified land holdings. We do not agree with seeking to use the derogation to reduce the percentage.

Figure 9:
Talamh Beo members position on Frontloading

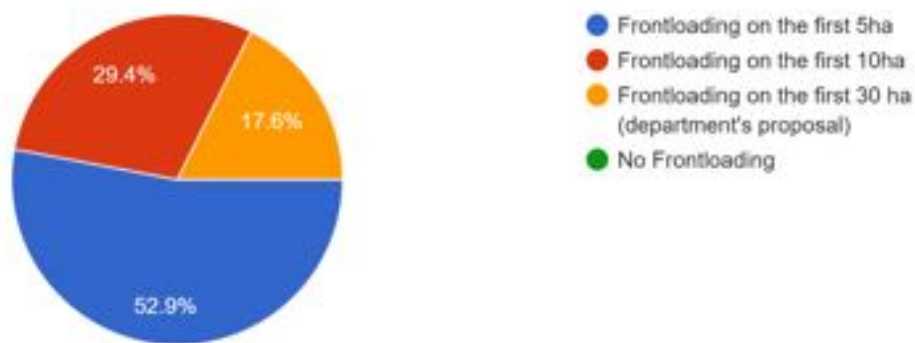


Figure 10: Talamh Beo members position on should Ireland look for a derogation to reduce the percentage for frontloading



Consultation Question 4

Should Ireland go beyond the 25% of direct payments to be allocated to eco-schemes? Or should Ireland use the flexibility in the regulation to reduce the percentage allocated to eco-schemes?

Talamh Beo Answer:

Talamh Beo would like to see Ireland going higher than the 25%.

We would not like to see the flexibility to go lower exercised.

Justification / comments:

We do not want to see existing schemes in Pillar 2 shifted into Pillar 1 to become eco-schemes under this measure especially if it causes the level of payments to decrease.

We also believe the eco-schemes should relate to eco-system regeneration not animal welfare solely, which should be covered under a different funding stream. Should animal welfare be coupled with another environmental ambition of the CAP, then it can be allowed as an eco-scheme.

Figure 11: Talamh Beo members position on whether Ireland should go higher than 25% of direct payments for eco-schemes or whether Ireland should use the flexibility to go lower than the 25% for eco-schemes.



Consultation Question 5

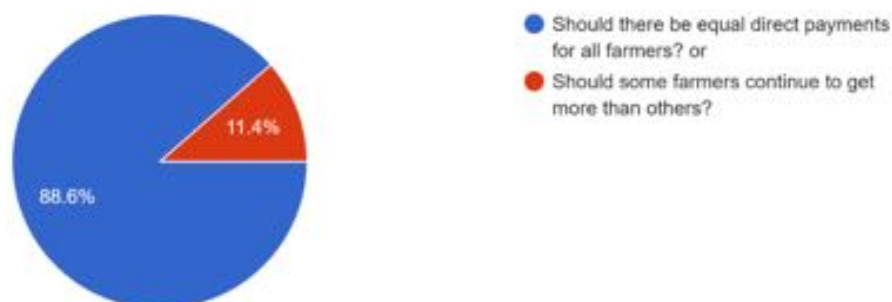
What aspects of the current system do you consider unfair, and what is the best combination of all of the above mechanisms in order to bring about a fairer distribution of direct payments?

Talamh Beo Answer:

We believe a number of aspects of the current system are inherently unfair especially:

- *Unfair distribution of direct payments. If we have a new set of criteria to deliver in this next CAP, we must have equal access to the resources to implement them. We thus call for equal entitlement value per hectare. We believe fairness means equal access to resources for equal obligations under GAEC's and SMR's.*

Figure 12: Talamh Beo members position on how to bring about a fairer distribution of direct payments – should there be equal direct payments for all farmers or should some farmers continue to get more than others.



- *Unfair representation of farming interests at discussion and decision-making tables. The farming bodies representing agribusiness are well represented and there is not one body representing the agroecological perspective. We thus request Talamh Beo be recognised as a social partner and participate in processes going forward.*
- *Supports to, and distribution of the quotas of, organic farming schemes is woeful. We have no possibility of getting to 7.5% organic farms, in fact our small percentage is actually falling - see government figures below¹ and a further description in Part 3 Organic Farming.*

Figure 13

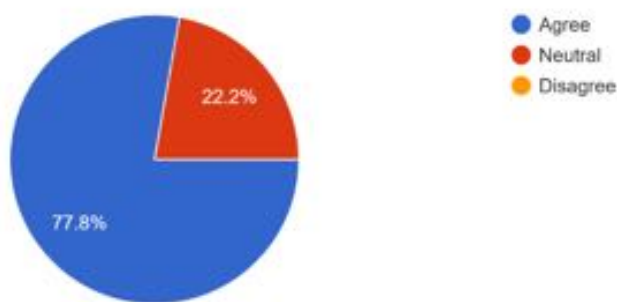
Organic Farming Scheme (OFS)

Total payments OFS 2016	€10.6m
Number of farmers	1,642 received 2016 Payment
Total payments OFS 2017	€8.92m
Number of farmers	1,582 received 2017 Payment
Total payments OFS 2018	€8.3m
Number of farmers	1,511 received 2018 Payment
Total payments OFS 2019:	€8.6m
Number of farmers:	1,512 received 2019 Payment
Total payments OFS 2020:	€8.4m
Number of farmers:	1,488 received 2020 Payment

¹ <https://www.gov.ie/en/publication/ceea9-scheme-payments->

- *We would like to bring the issue of Equity to the discussion. Young, trained farmers (male and female) are deemed a vulnerable category setting up and running their farms. They are thus automatically allocated the average payment. We would argue that single parents, widows and widowers, spinsters and bachelors farming and living on their own are also a vulnerable category. We would like to see these farmer’s vulnerability being recognised and those currently below the average entitlement value being allocated the average entitlement value with immediate effect. Covid has placed an unnecessarily high burden on all farmers, but the vulnerable categories are hardest hit and Covid PUP payments were not available to them – this ask cannot wait until 2023. It needs to come in on the 2022 payment.*

Figure 14: Talamh Beo members position on extending the average entitlement value payment to vulnerable categories beyond young, trained farmers to single parents, widows and widowers, spinsters and bachelors farming and living on their own.



PART 2: The 6th DAFM question, S4 stakeholder consultation and Gender Equality

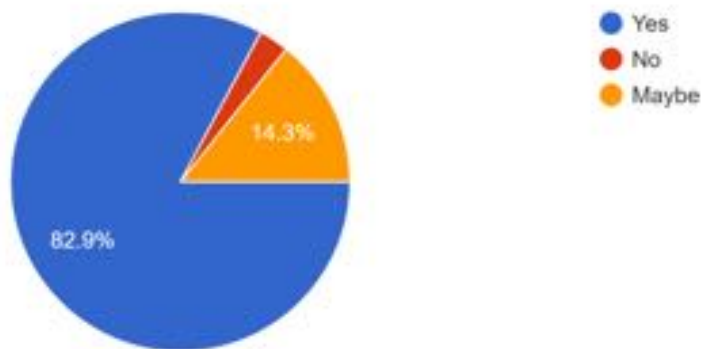
Consultation Question 6

Should there be a specific intervention to incentivise gender equality?

Talamh Beo Answer:

Yes, and we would like to see a stronger and more specific statement of intent from the Department. Our recommendations are outlined below.

Figure 15: Talamh Beo members position on whether we need to see something stronger than ‘specific intervention to incentivise gender equality’ from the Department



We would like to point out the following areas where gender equality applies in agriculture:

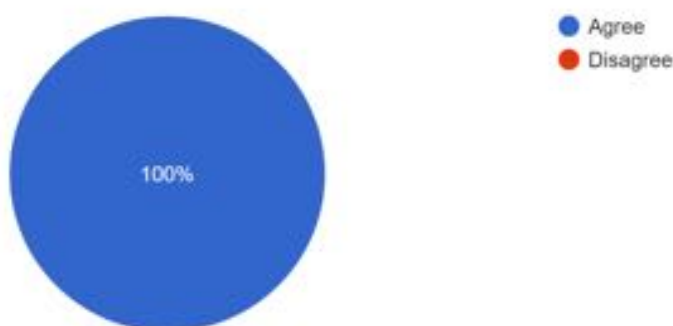
1. Women farmers having equal access to resources.

This includes women with vulnerabilities (single parents, widows, spinsters, disabilities, extremely low single farm payments etc) being able to access some of the resources in the first place. For example, TAMS with its pay first and claim back later approach excludes women and other vulnerable categories who are unable to access credit due to the above-described vulnerabilities. Whilst there is a suggestion to increase the TAMS grant to women, unless it is matched with credit or micro-credit, only women who are married or in receipt of high-value entitlements or an off-farm job will be able to access this.

We recommend the following intervention:

- *Equal access to resources also includes (figure 14) women and other vulnerable categories having their vulnerability recognised as was done for the young farmer and being allocated the average rate of entitlement payment immediately.*
- *Providing women and other vulnerable categories with access to credit and micro-credit so that they might be able to access schemes like TAMS and LEADER etc.*

Figure 16 : Talamh Beo members position on credit and micro-credit to be made available to women and other groups unable to access credit (especially for farmers on low value or no entitlements)



2. Women farmers having equal access to land and their ability to use their land without disturbance.

Women are still facing succession prejudice and an inability to purchase land as a single woman (see credit issues as raised above).

Where women are the owners of their farmlands, some (depending on geographic location and long-term local practices) find their ability to use or exercise their rights extremely difficult. Many women, widows or spinsters / single parents for example without an adult male heir in the wings, are 'squeezed' off their land. Whilst this practice is not uniform across the Island, it is still ongoing in remote and upland areas and particularly where shared lands (commonages) are involved. All farmers are entitled to security of tenure and the right to use their own land without disturbance.

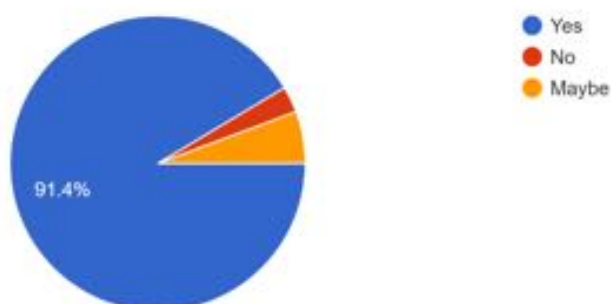
We recommend the following intervention:

- *Participatory research undertaken by women to understand the nature and scale of problems experienced by women in their right to access, and undisturbed use of, farmlands. This research needs to outline how these practices (which are effectively obstacles to productivity, competitiveness and inclusion) can be removed and how women can be supported during the removal process.*

3. Women farmers having equal access to representation in all farming areas and the right to represent themselves and their specific issues.

Women farmers are poorly represented in the established farm representative bodies the DAFM and its agencies like Teagasc and Bord Bia engage and consult with. Either women's issues (as described above) are raised by men or not at all. Either approach is unacceptable to us.

Figure 17: Talamh Beo members position on whether they agree that the Department, its agencies and other organisations that consult and engage with farm bodies must stop turning a blind eye to the lack of farm women leadership at their national and executive level.



We would like to see the existing farm organisations and the newly formed Women in Agriculture Stakeholder's Group to tackle the issue of women leadership and women's issues in their respective organisations, and we would like to see the DAFM and its agencies become more aware of the gap that exists in the richness of discussion and interventions with these groups when women across all stakeholder groups are not part of the process.

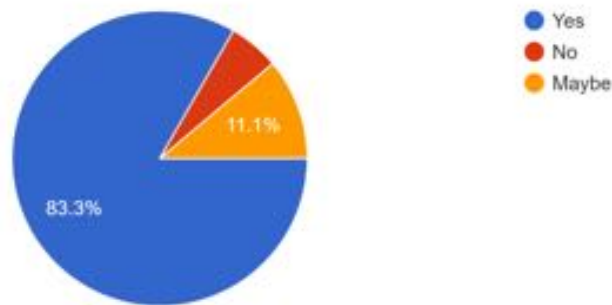
Where the DAFM and its agencies are developing policies or programmes which are about us women, they must include us in designing the policies or programmes.

As with our earlier points illustrated in figure 3 and 4, an agroecological farming perspective must be fed into the CAP Strategic Plan. We would like to see women from this sector assisted to feed in their perspective. Whereas many of the existing farm organisations have considerable resources / operational budgets and full-time staff at their disposal, we in Talamh Beo do not.

We recommend the following intervention:

- *A body of participatory research to audit the current state of gender representation (both in terms of number of women in leadership positions and in terms of what and where gender issues are raised and dealt with) in farm representative bodies, the DAFM, its agencies (Teagasc, Bord Bia, Origin Green), education and training bodies (from schools to universities) and any other agricultural areas. This information will provide the basis for understanding the current lack of gender representation and how to design programmes to see gender mainstreaming rolled out across the agricultural sector.*
- *Talamh Beo women would like, as with the organisation more broadly, to contribute retrospectively to the processes from which they (in terms of gender and agroecological perspective) were excluded – namely the CSP needs assessment, the SWOT analysis and specific interventions around gender and eco-schemes.*
- *Talamh Beo would like to engage with the Minister for the establishment of an agroecological Farm Women's Group to be elected from those women unrepresented by the established farm bodies to advise and assist the Minister, the Department and its agencies on how to achieve gender mainstreaming in agriculture.*

Figure 18: Talamh Beo members position on campaigning for the establishment of an agroecological Farm Women's Group to be elected from those women unrepresented by the established farm bodies to advise and assist the Minister, the Department and its agencies on how to achieve gender mainstreaming in agriculture.



4. We would like to see equal access to and gender mainstreaming in education and research.

There is a considerable body of participatory research required to understand where the bottlenecks to gender mainstreaming are across the agricultural sector. This includes gender mainstreaming in the DAFM and its agencies (Teagasc, Bord Bia, etc); gender mainstreaming in agricultural representation bodies; gender mainstreaming in agricultural education and training on all levels from school programmes to Ag Science at secondary level, to the Green Cert, to the universities and colleges and research institutions like Teagasc.

Too often, we farm women are seeing research undertaken for men farmer’s mental health or male farmer’s heart health when these issues apply not only to female farmers, but to the partners of male farmers as well. Being assured that the ‘content will be adapted for women’ is not good enough.

We would also like to see research undertaken by women, about women – especially in the areas where lights are not often shone. This includes issues described in the points 1,2 &3 above.

We recommend the following intervention:

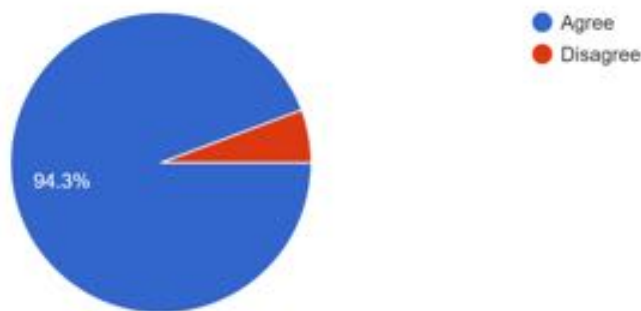
- *As above point 3’s recommendation, a body of participatory research to audit the current state of gender mainstreaming and where the bottlenecks to delivery are situated and proposals and recommendations for how they might be removed.*

5. We would like to see women and men without family support to be assisted with childminding supports which will enable them to engage and participate in organisations.

Whilst the timing of meetings can be held at hours which are easier for women or single parents of any gender to attend, there are often periods where a women or single parents cannot engage for years until such time as her / his household is old enough to operate without the parent’s presence. Zoom meetings have helped, but child-minding can make the difference for women or men to attend meetings. We understand universal access to childcare to be a broader issue but freeing a woman up to attend a meeting would definitely incentivise gender equality.

We recommend: a scheme that allows single parents to access childminding which in turn will allow her to participate in meetings and organisational activities.

Figure 19: Talamh Beo members position on a scheme that allows women to access childminding which in turn will allow her to participate in meetings and organisational activities. (We understand access to childcare to be a critical bigger / broader issue but freeing a woman up to attend a meeting would incentivise gender equality.)



PART 3: Additional Observations on the draft CAP plan Pillar 1 & 2

(For ease of integrating the responses, the numbering in this section is as found in the consultation document)

5.1 Pillar I

(1) Definitions:

- **Agricultural Activity:**

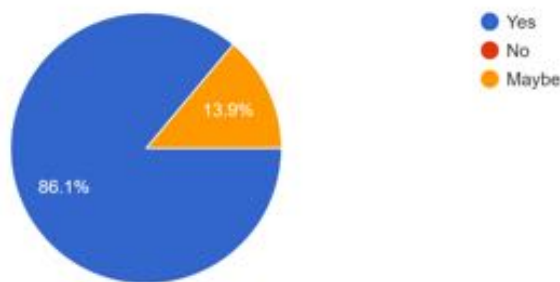
Talamh Beo's observation: We would like to see the definition of Agricultural Activity broaden to include Ecosystem Regeneration. This is especially so in the light of *'the agricultural activity must result in the maintenance of the agricultural area'* – in many agricultural areas, the land or ecosystem in which it is located is degraded or in need of regeneration.

While our principal agricultural activities are livestock orientated (dairy, beef, registered broodmares and sheep), there will always be a call from farmers to not see the numbers of ruminants limited as their ability to increase their income can only be met by expansion or efficiencies. We must see more agricultural activity options available to farmers – and when we do, many farmers will diversify away from ruminants towards the new market opportunities.

- Agroforestry / silvopasture must be acknowledged as a mixed agricultural activity, and the eligibility of land under agroforestry to be maintained as farmland / utilisable agricultural area is essential.

- We acknowledge that Apiculture is an agricultural activity and funded under the CAP. We would like to see managed honeybee hives with a margin for wild pollinators become a livestock unit.
- We would like to see the development of rural hemp-based industries including hemp for protein crops (human and animal); hemp for building materials (hempcrete); hemp for bedding; and more.

Figure 20: Talamh Beo members position on whether managed honeybee hives with a margin for wild pollinators should be a livestock unit option for farmers.



- **Agricultural area:**

Talamh Beo's observation:

- *If paludiculture is an agricultural activity, why do we not see wetlands and bogs in the definition of agricultural area? If we included ecosystem regeneration as an agricultural activity, then regeneration and restoration of wetlands and bogs can be part of the farmers land holding and managed holistically, rather than excised from it and managed separately. Wetlands and bogs need to be eligible as part of an integrated farming system.*
- *As Apiculture is an agricultural activity, the area under which a farmer has a certain number of hives should be considered an agricultural area.*

- **Eligible Hectare:**

Talamh Beo's observation: *The proposal to allow "up to 30% of a parcel containing features that may be beneficial to water protection, climate or biodiversity to be considered eligible" is welcomed.*

*We would like to see a **moratorium on the removal** any features which are beneficial to water protection climate or biodiversity due to ineligibility under the current regulations. We don't see the logic of removing features in 2021 and 2022 that will be eligible in 2023. Those features that fall into the 'beneficial' description that were removed from land parcels in 2021 should be restored.*

We believe that farmers are only removing features beneficial to water protection, climate or biodiversity because they have been made ineligible for future payments.

- **Active Farmer:**

***Talamh Beo's observation:** We agree to the negative list being maintained. We believe the person in receipt of payments should be the one working on the farm, doing the work.*

(2) Conditionality

Talamh Beo's observation:

We note that there is no reference to social conditionality in the draft proposal of the department. We would like to explore this issue with the DAFM.

GAEC 2

Re 'Protection of wetland and peatland at the latest by 2025. DAFM is considering appropriate definitions of peatlands and wetlands.'

We would like to see ecosystem regeneration as an agricultural activity alongside options for Paludiculture and wet farming. We would also like to see farmers from these areas participating in exploring the above-mentioned definitions and options. Being part of the solution may generate buy in.

GAEC 9

It is good to see this measure being applied to all farmland not just arable land. We believe if biodiversity loss is to be halted, then we need to see as many choices for natural spaces as possible. Thus, we would want to see more options than what is outlined on the list. Many of the options on the list (catch crops, eligible forestry -if that is Sitka Spruce, short rotation coppicing) do not provide long-term habitat / food for biodiversity. We would also like to endorse the CAP for Nature call for 'quality, quantity and connectivity [to] matter'. We would like to see the list developed to include incentives for farmers to co-operate regarding the positioning of their non-productive areas to create pollinator / insect / small animal corridors.

GAEC 10

'Ban on converting or ploughing permanent grassland in Natura 2000 sites designated as environmentally sensitive permanent grasslands in Natura 2000 sites'. Farmers who have land designated as SPA's or SAC's and thus have their ability to 'use their land productively' curtailed should be paid for the designated status. This should have happened from the start. You will not get buy-in from farmers for environmental protection if they must pay for the associated 39 Actions Requiring Consent (ARC's) whilst having their current land use practices curtailed. This again, raises the need for ecosystem regeneration to be considered an agricultural activity.

(3) Basic Income Support for Sustainability (BISS)

We would like to challenge the definition of ‘viability’ in the opening sentence *‘This intervention is designed to provide a direct income support to Irish farmers to underpin their continued sustainability and viability’*. The current definition per Teagasc is that a farm is viable if it can pay the wages of a farm labour unit. Technically, this puts most family farms as unviable from the outset while at the same time, channelling the resources to the mass production of meat and milk and timber for the export market.

There are many farmers who are working full time (particularly new entrants in the short supply chain sector) who receive little or no farm subsidies at all. **All farmers should be guaranteed a basic income support payment to ensure they have a fair income and can continue to fulfil their role in providing food, ensuring social continuity in rural areas and regenerating ecosystems.**

Talamh Beo would like to propose a minimum basic payment for all farmers, with a specific focus on new entrants and farmers who are currently excluded from the entitlements system. Farmers supplying local markets in particular should be supported – Irish citizens will no longer tolerate the inequality and unfairness which sees some farmers financially supported to produce food for export and others receive nothing for supplying food for local communities.

Talamh Beo would like to the CAP Strategic Plan used as a vehicle to transition Irish farming from a system based on mass production for export markets to one which regenerates our land, ensures livelihoods and fairness for all farmers, and meets the challenges of climate adaptation and mitigation and biodiversity and habitat regeneration. As indicated in our position on convergence, all farmers will be required to get on board with climate adaptation and mitigation and biodiversity and habitat regeneration – and all farmers should have equal access to the available resources to do so.

We believe the entitlements system is outdated and has allowed a lot of unequal access to resources to be channelled to those whose land use practices favoured overstocking during and before the reference period. It is not a fair way to assess individual farming methods and systems and delivery of food and public goods.

We further believe the stacking, leasing, and general trading of entitlements to be a practice that should cease. If a farmer is no longer farming, especially if the land has been sold, then those entitlements should be deactivated rather than be an instrument for trading.

While we believe the current system will be maintained we would like to see the sustainability of the BISS raised in the mid-term review.

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

Talamh Beo acknowledges that there should be supports for attracting young farmers into the sector, however, we have the following comments to add.

- Our members are generally well below the average age of the established farm organisations demographic, yet many of our members have no entitlements or Complementary Income Support. A substantial number of our farmers are leaders in the fields of regenerative farming, Environmental Outcomes Verification, long time organic practitioners etc – yet they have received no support from the CAP whatsoever. All educated young farmers should be able to access this support.
- This brings us to the definition of ‘educated’. At present this means a completed Green Cert or Agricultural Degree. Yet the Green Cert training is inadequate for farmers in Organic systems. We would like to see the introduction of an Organic Green Cert, and for that cert to qualify the farmer as ‘educated’.
- We would also like to see an element of means testing to be applied to the Complementary Income Support. Many young farmers are stepping into the shoes of their parents, inheriting or entering farm partnerships with considerable infrastructure. The additional support they receive is allowing them to expand / invest heavily in, for example, dairy or intensive beef practices. They are then finding themselves unable to service their level of debt as they move forward / out of the young farmer support or encounter fluctuations in milk prices.

At the same time, we have young farmers and their families entering farming with all their income going towards financing their land purchase and start-up costs. Many of our members find that after 5, 10, even 20 years of farming, they are unable to afford a safe, secure home, do not have running or safe drinking water, and have inadequate sanitation facilities. Complementary income support, it is suggested, should have the aim to help young farmers enter agriculture and to meet some basic needs for getting established – not buy young farmers into unsustainable intensification / expansion and debt.

(5) Eco-scheme

Talamh Beo would like to note that the eco-schemes proposed were developed without any input from the agroecological perspective. There is thus a shortage of Agroecological options available. As we have mentioned before, we would like the opportunity to retrospectively feed into this process.

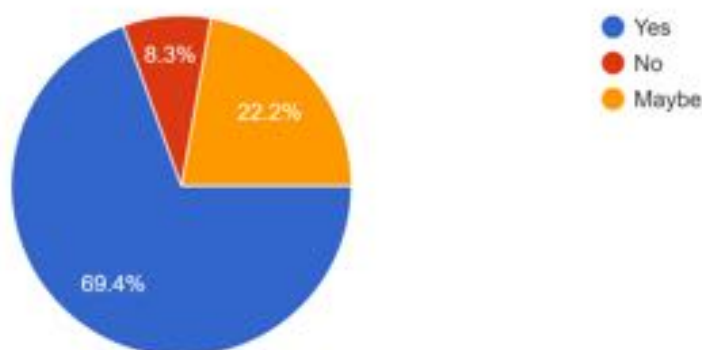
Our general comments here include:

- Eco-schemes should primarily be directed towards regenerating ecosystems to thriving. Too often we make the mistake of imposing a land use option onto ecosystems with detrimental environmental and ecological outcomes and then ‘tinkering around the edges’ to fix the damage. We advocate to start with the ecosystem of an area, regenerate it to thriving, and

then match appropriate land use practices to the healthy ecosystem.

- We support a results-based approach to programmes and schemes.
- We would like to see the ‘polluter pays principle’ to apply. Programmes and schemes should be there to advise and assist those farming enterprises whose footprint is unsustainable or damaging on an environmental and ecological basis. Farmers should be rewarded through payment for results-based delivery of outcomes whether they be climate mitigation / adaptation, protection or improvement of air and water quality, regeneration of habitats and species, and reduction in the use of pesticides, herbicides, insecticides and chemical fertiliser. As is evident in the DAFM’s AgClimatise Programme, programmes and schemes are there to assist the polluter to pollute more efficiently whilst there are very few measures available to farmers farming extensively with low external inputs.
- Animal welfare measures are not per se environmental measures. We believe animal welfare payments under Pillar 1 can be justified if they contribute also to another CAP environmental specific objective.
- We acknowledge the benefits of extensive grazing regimes and lower stocking densities in livestock production - especially in High Nature Value areas and organic farming systems. However, we acknowledge that the length of time livestock spends grazing in an area has a big impact on the environment. We would thus advocate eco-schemes to move beyond simply advocating a lower stocking density and to incorporate options for shepherding and rotational grazing. This is especially relevant for the uplands and the 426,000ha held under commonage.

Figure 21: Talamh Beo Members position on whether farms in the Organic Farming Scheme / in a possible Regenerative Farming Scheme should run at a lower stocking density than the current requirements.



- Slurry spreading and increasing slurry storage is neither a solution to GHG emission targets or Air Quality targets (especially ammonia). We would suggest the processing of slurry and

the digestate be made available to the farmers for spreading when weather conditions are most suitable.

Our members had the following suggestions to contribute for eco-schemes and AECM's:

- A results-based ecosystem regeneration scheme.
- An Ash removal (along roadsides and railways where and when they present a danger) for biofuel to biochar programme. Farmers should be supported to keep dead trees on their land as they are invaluable ecosystems and support more biodiversity than living trees.
- Setting up local native / broadleaf nurseries and local planting teams.
- Agroforestry type systems across all sectors (dairy, beef, tillage etc).
- Specific river basin plans like the Bride Valley Project.
- Seed saving is crucial, and farmers should be supported to save their own seeds.
- Local farm walks and visits (we really need to look at public liability in Ireland as it is disconnecting people from nature).
- Where rewetting or wetland management 'locks in' carbon stores, farmers should be paid for keeping the carbon 'locked in'.

(6) Apiculture

As has been mentioned on several occasions throughout this document, we would like to see Apiculture developed beyond simple research and a paltry budget of €123,280 per annum. We acknowledge that where farmers take up apiculture / managed hives as a livestock unit, they will be diversifying the plants and trees on their land to provide feed for their bees all year round. This includes trees for spring and early summer feeding, clover and wildflowers for summer and shrubs, creepers and hedging for extending feeding well into the autumn. To prevent inappropriate commercial / industrial responses which may well have a negative impact on other bee species and wild pollinators, we propose managed hives with a margin for wild pollinators to be considered a livestock unit.

We believe that this will offer another stream of income into farmlands, especially those in high nature value (HNV) and upland / hill areas.

(7) Sectoral Intervention in the Fruit and Vegetables Sector

Fruit and Veg production remain the area with most potential growth in terms of import substitution in the Irish market. Irish citizens are outraged that Ireland continues to import huge quantities of fruits and vegetables which can be produced here. Talamh Beo believe the best way of ensuring import substitution and creating resilient food systems is through a decentralization of fruit and vegetable production in Ireland.

Small scale production techniques are labour intensive and have been shown to be more productive per acre than larger operations. There is an opportunity to create growth and employment in this sector while providing high quality food into local communities across the country in peri urban and rural areas. This can best be achieved through supporting the establishment of small to medium sale production systems involved in short supply chains and local wholesale. Ireland needs a new framework for supporting this transition – many ideas to stimulate the sector can be found in Appendix 1 - “Towards a Local Food Policy Framework”

We note this sectoral intervention is orientated towards commodity export supply chains and we would like to see intervention orientated to local, short food supply chains as well as opening to new sectors (honey, hemp etc). We would like to see the members of the PO’s being the beneficiaries of the intervention.

Regarding the proposed eligibility / selection criteria for Producer Organisations (PO’s), we have the following comments:

- The threshold for recognised Producer Organisation is prohibitively high (at €2.5 million of Marketed Produce). Support should prioritise small to medium cooperatives, whose annual profits are shared equally among the members and strengthen the long -term position of farmers in the supply chain.
- Specific supports should be introduced to establish POs for farmers working in the short supply chain sector
- By definition, new PO’s are excluded.

(8) Coupled Income Support for Protein Aid

We support the need to produce more protein crops in Ireland for animal and human consumption. Regarding the proposed eligibility / selection criteria for Coupled Income Support for Protein Aid, we would like to see the following included:

- Hemp as a protein crop for animals and humans.
- Sprouting barley to be explored as an addition to winter feed of silage and to reduce the need for imports of soya and palm products.

(9) Complementary Redistributive Income Support for Sustainability (CRISS) Frontloading

‘The purpose of this intervention is designed to redistribute CAP funds from the larger farms to medium and smaller sized farms and is now proposed as a mandatory element within the direct payment measures. The basic premise behind the measure is that support through CAP should go to those who needed most or those who are contributing most to the cap objectives and that the redistribution funds from larger farms to small and medium sized farms aids this measure.’

Talamh Beo agrees with the purpose of this intervention and its basic premise. There is a caveat, however. There are farmers with larger farm area, but who are still on a low entitlement values. This is especially true in the hills and uplands. Simply put, it is unfair to take from the poor and redistribute to all, especially when the aim is that the support should go to those who 'need it most'.

Our proposal is thus that CRISS should be taken from larger farms who are in receipt of entitlement values over the average. To set it at a round figure, we propose that CRISS should be redistributed from large farms in receipt of entitlement values over €350/ha, and medium farms over €500/ha excluding the first 10ha. We would suggest a modelling exercise be undertaken to evaluate this recommendation. One model is the current 10% recommendation and the second would be 15 / 20% CRISS.

5.2 Pillar II

(1) Agri-Environment Climate Measure (AECM)

The purpose and proposed structure read well, though more details on the AECM's is needed. We welcome the results-based actions and the locally led approach.

- Talamh Beo would like to engage with the DAFM around what the 'right actions in the right place' might mean from an agroecological perspective. We have mentioned before the need to consult with farmers in the design of interventions around land re-wetting.
- Tree planting measures, including agro-forestry and riparian planting are welcomed. We would like to see this initiative matched with the development of local tree nurseries and local planting and maintenance teams.
- We would also like to highlight the 426,000ha of commonage in Ireland's uplands – an area and topic which has been neglected by the Department for many years. Modernisation is encouraged across the farming sector, yet this area is ignored. We would welcome the opportunity to discuss possible options for AECM's on commonage lands from an agroecological perspective as well as feeding into discussions on modernising tenure arrangements and land use.
- We would like to suggest an option which supports farmers saving their own seeds.

(2) Agri-environment Climate Training

Ongoing training for farmers is welcomed. We would like to see the more interactive training, with peer-to-peer and participatory methodology built into the design.

(3) Organic Farming Scheme

Organic farming in Ireland has always been something of a Cinderella system in terms of its take up by Irish farmers. Successive governments have failed to achieve any traction in developing the sector and the DAFM statistics tell a tale of woe. The number of organic farmers in Ireland

according to DAFM in OFS was 1642 in 2016 and this has now fallen to 1448 in 2020 and is expected to fall again in 2021. How does this make 7.5% of UAA attainable?

The Organic Farming Scheme in 2021 was again under subscribed again with the target of 500 new entrants falling short by almost 200. While the ambition in the EU is to have 25% of UAA converted to organic farming Ireland is languishing at 1.6% and this is likely to fall even as the ambition is to have 7.5% farmers under the current CAP.

The following is required if Ireland is to have any chance of even getting to a 5% target over the period of the next CAP:

- *Immediate increase in conversion and maintenance payments to organic farmers. The first 10 hectares should go to 500 /ha for in conversion and 350/ha for maintenance payments. These payments can be tapered back by 50/ha for each additional 10 hectares up to a max of 50 hectares. These payments would apply to grassland farmers.*
- *Additional supplementary payments to be paid on certain cereal crops and horticultural crops which have a strategic value to the sector.*
- *Small scale organic producers to have the burden of organic certification lifted through either subsidised certification or group certification costs.*
- *Front Loading of OFS on the first 3 hectares with higher payments for horticultural operators with a minimum of 0.5 ha. Payments here need to be at €1000 per hectare to pay for the public goods and as they support short supply chains.*
- *Mixed cropping is no longer the reserve of cereal growers, and there should be a menu option on DAFM system “Mixed Cropping – Hort.”*
- *ANC stocking rates to apply to land in the Severely Handicapped areas where 0.5 LU/ha is not feasible to encourage take up of the organic option.*
- *Scheme of grant aid to be revisited with up to 60 % grant aid available and a 30% payable in advance to allow small operators to cashflow projects for any farmers on less than 10 hectares.*
- *Origin Green or Quality Assurance cannot be applicable to Organic Produce as it had its own internationally recognised quality assurance system. 20% of Bord Bia Budget to be ring fenced for promotion of Organic Produce nationally and internationally.*
- *Organic farmers to be given priority access to any AECM scheme with a layering system to prevent the possibility of double funding. For example: In an agroforestry situation the farmers get paid for the planting and maintenance of the trees in addition to the organic payments.*

Without radical actions of this nature, farmers will continue to drift away from Organic Farming and the sector will enter terminal decline.

(4) Areas facing Natural Constraints (ANC)

In High Nature Value areas of farming and the uplands, grazing can be an important component of maintaining certain biodiversity rich habitats. Whilst less extensive farming practices are traditionally advocated for livestock management, we would like to explore regenerative and holistic farming practices on these lands. We recommend, as with organic farming, that stocking densities be lower than .5LU/ha.

(5) Producer Organisations in the Beef and Sheep Sector

We would like to see this initiative extended to the Apiculture Sector too.

We also note the difference between the approach to Producer Organisations in the Beef and Sheep sector and the Producer Organisations in the Fruit and Vegetable Sector. We would like to see fruit and vegetable producers producing for the local market being able to access the supports described in this measure.

(6) Suckler Carbon Efficiency Programme (7) Dairy Beef Welfare Scheme (8) Sheep Improvement Scheme

We support measures aimed at improving the environmental sustainability of the national beef herd and to build on the progress made by the Sheep Welfare Scheme under the last RDP.

We have the following comments to make:

In all three schemes Eligibility Conditions hold that the applicant must be a member of the Bord Bia Sustainable Beef and Lamb Assurance Scheme. There are, however, existing certifications - for example Organic certification or Environmental Outcomes Verification (EOV) Certification. The latter verification certifies that land and soil is actively regenerating – a critical results-based certification for going forward.

We asked our members opinion regarding Bord Bia certification being the only option if you are engaging in these schemes under CAP.

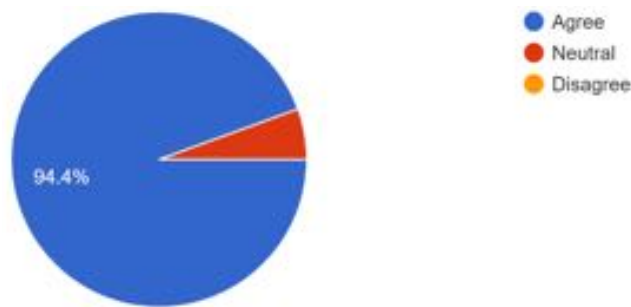
Figure 22: If joining Bord Bia does become a requirement, then it should not be the only options open to farmers when there are other higher certification standards such as Organics, EOV (Environmental Outcomes Verification) and others. Talamh Beo members indicated if they agreed with this statement or not.



In the last CAP, a Beef Genomics and Data Scheme was introduced to encourage farmers to breed cattle with certain traits to make them more productive, efficient and thus of a higher

economic value. There is the proposal to extend this to sheep in the new CAP Strategic Plan. Whilst we understand the value of genomics and data, we believe farmers have been doing this for the last ten thousand years. Modern animal breeds and fruit and vegetable plants are a result of farmers breeding selectively. Research and data must make space for farmers to still practice an essential part of what makes them farmers – the ability to breed and save their own plant and livestock genetic material.

Figure 23: Talamh Beo members position on supporting and maintain farmers’ traditional knowledge and skills regarding animal and plant selection for traits



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

Talamh Beo will be launching its Soil Biodiversity Literacy and Enhancement EIP shortly. Our project is truly locally led. It was designed by farmers on the ground and will be implemented by farmers on the ground. Whilst we will have learned more about this intervention in 12 months time, we have the following comments to contribute now:

- *We support the proposal to cover the costs of developing the Operational Group Plans under Phase 2 – we financed it ourselves but found it rather burdensome.*
- *We would like to suggest that where similar locally led projects (as opposed to locally implemented but led by academic or agencies) are being developed by farmers, that there is a component at the start of Phase 3 where mentoring support is available from Project Managers / Team Managers of previous EIP's. This support could include how to tailor the project and its implementation structure and basic Project Management training for the whole team. Although it is recommended that one person on the project has formal project management training, it is useful for the whole team to learn the basics. We would also like to recommend that the Risk Registers and lessons learned from previous projects are shared with the new Project Managers.*

(10) On-farm Capital Investment Scheme

Talamh Beo supports the aim of providing support to farmers looking to invest in capital projects on their farms. As we have mentioned earlier in the document, we believe that young farmers and women – especially women (or men) who are single parents or living alone - need additional assistance in accessing finance. We believe that there should be a measure of ‘means assessing’ involved – we do not support young farmers accessing finance to intensify dairy or beef ventures when they cannot repay the debt in future years without further subsidies or watch their farms taken over by vulture funds. We do support investments in farm diversification, for example

chilling and cooling facilities which will have the added benefit of reducing food waste; direct selling initiatives; on-farm processing equipment; seed harvesting equipment; hemp micro-decorticators etc.

We also support investment in farm safety, and we point to an area which is overlooked when the focus on farms is only about economic and environmental considerations and there is no attention paid to social considerations. There are farmers, again many of them from the vulnerable categories of men and women living on their own, single parents etc, who are living in conditions that can only be described as inadequate or downright unsafe. Farmers need to access finance for basic safety like Safe drinking water (filtration / UV systems), basic sanitation (septic tank or composting toilets), rewiring where electricity has become unsafe, etc.

(11) Continuous Professional Development (CPD) for Advisors

- This is an important issue. NOTS should be supported (not just Teagasc) and we need to see better supports and a wider roll out of organic farming training.
- We would like to raise the issue of advisors and planners over the longer term / going forward (perhaps as a discussion during the mid-term review). While we are dealing with an aged or aging demographic of farmers who are needing to learn and apply new information and technologies, farm planners and advisors are a necessary and useful service. Where young farmers are coming into the sector, they are doing so with training under their belt and with an aptitude for and experience with technology and innovations. It is highly possible, that the generation of young trained farmers will be able to fulfil a lot of the planner functions through participating in an online portal containing 'tools' (for example, being able to calculate their carbon footprint, being able to assess how much fertiliser to spread according to different farming systems (conventional 'best practice', regenerative, organic etc), mapping their fields, assessing the biodiversity on their lands, completing their scorecards for results-based activities etc. Training modules keeping a farmer up to date with policies and programmes and information (for example environmental training or how to set up PO's in their local areas) could be rolled out via this online platform. This could be further enhanced if local groups are established under AECM measures – training and assessments could be done with and by the group strengthening the locally led approach.
- There is a growing perception amongst farmers that they are the ones being farmed. Planners and advisors are yet another tier that depend on farmers for their livelihoods. We would like to suggest a scheme that makes quality planning and advising available to all farmers. At present, many farmers on low entitlement values – especially those from the struggling small suckler and sheep sectors – are unable to afford anything more than Teagasc's most basic €180/year service which includes signing and submitting their single farm payment and a limited number of telephone calls. We would like to point out that where a person is below a certain income threshold, they are entitled to a medical card to access medical care. Where a person is below a certain income threshold, they are entitled to access Farm Assist or some form of Social Welfare. We would like to suggest that farmers who are below the average entitlement value payment should be entitled to quality planners / advisors at a reduced or subsidised rate.

(12) Knowledge Transfer Programme

- Similar points can be made to those described above in relation to online learning portals and peer to peer learning and sharing groups.
- We would like to see knowledge transfer being a two-way process as opposed to the current one direction teaching. Local knowledge needs to be learned from older farmers who have decades of direct / lived experience which cannot be learned from a book or course. Examples of this would be beekeeping, seed saving, selecting animals and plant traits passed down through generations, food preservation and storage etc.

(13) LEADER Programme

Our members have had experience with LEADER programme funding and their comments include:

- *Funding proposals and paperwork needs to be simplified or there needs to be a programme which allows farmers to access support or mentoring for the process. It is not that the farmers are unable to do the paperwork, it is that the paperwork takes up a huge amount of time – often not matching the amount being sought. This is a constraint which needs addressing through simplification.*

PART 4: Talamh Beo's Vision:

A Local Food Policy Framework and A Rights-Based CAP Strategic Plan

1. A Local Food Policy Framework

Introduction

We want everyone in Ireland to have access to high quality, locally produced food. We also want farmers to earn a fair living from providing that food into their communities. That means creating pathways for local food production through a positive policy framework which incorporates income supports, labour and finance incentives, pilot projects for land access and short supply chain supports and infrastructure.

Why local food producers are important:

Small-scale local food producers selling directly into local markets provide multiple benefits to the local environment, community and economy:

- *The production and consumption of food in short chains and webs means increased economic and social activity in rural areas.*
- *Agroecological growers and producers have a low environmental impact and a small carbon footprint, while providing multiple complimentary benefits.*
- *Agroecological farming systems have the potential to restore space for local wildlife areas and biodiversity while regenerating ecosystems.*
- *Local producers marketing their produce directly can supply, fresher, nutrient dense foods directly into local households, meaning better diets for people in the locality.*
- *Local food production systems have the potential to provide increased levels of local employment.*
- *Locally orientated, diversified farms are relatively resilient to economic instability, and more capable of adapting to uncertainties brought about by climate change and global market fluctuations, pandemics and other supply chain shocks.*

What we need²

(1) Institutional recognition for Local Food Producers

Many farmers involved in short supply chains and providing food for their communities suffer from a lack of recognition and integration into the existing systems of supports and programmes. We believe the first step in supporting this sector is to offer recognition to farmers producing primarily for the Irish market, coupled with a completely set of new complimentary supports.

(2) A Local Food Policy framework

- a. **Income supports** – Local Food Producers often have labour intensive production systems and are forced to compete with imported (often highly subsidized) production from overseas. We propose an income support tied to the destination of sales by local farmers – farmers providing food into local markets would receive a payment (up to a maximum) based on a percentage of those sales into local markets. This would ensure a fair income for farmers, but also stimulate more local production and the associated economic activity (including employment) in rural areas.

² (See Annex 1 for more detail)

- b. **Finance** – Farmers supplying local markets and establishing new on-farm enterprises for short supply chains (horticulture, poultry, mushroom growing, micro dairying, direct sales of meat etc) often struggle to source effective finance options for their initiatives. Talamh Beo propose a set of initiatives based around zero interest loans and other financial incentives to facilitate growth in the sector.
- c. **Labour and Social Aspects** – As highly intensive production can be more labour intensive and due to the issues with labour requirements in local food systems, Talamh Beo believe a specific set of supports is required in this area, also including training and upskilling of new entrants into the sector. One idea is a “Farmbridge” type scheme which would encourage people to work in local food production.
- d. **Access to Land and Young Farmers** - For new entrants not from established farming families, land can be the first barrier to establishing a new local food production business. At the same time an ageing farming population looks for solutions to ensure the continuity of people on the land. Every rural townland wonders how many farmers will still be around in twenty years time. We need a land access strategy which incorporates social innovation, farm organisations, community groups, local authorities and other actors.
- e. **Short Supply Chains** - Short supply chains are key to the development of a functioning local food system. Short supply chains are built on trust and citizen participation – bringing people closer to where their food comes from and a deeper awareness of how it is produced. Short supply chains offer multiple social, environmental and economic benefits while building community cohesion, stimulating rural networks, reducing isolation and above all providing high quality, nutritious food to communities, towns and cities across the country. We need a specific set of supports to develop this sector

(3) A multi-department, integrated approach to reviving and climate proofing our rural communities:

The Local Food Policy Framework incorporates multiple social, economic and environmental benefits. As such it is relevant not just to the Agricultural sector but also, Health, Social Protection, Education, Local Authorities and other bodies.

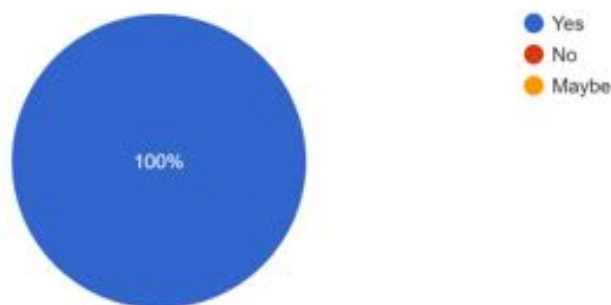
This diversity of potential benefits could benefit from an integrated approach to the development of a Local Food Policy Framework.

- The support of natural ecosystems (agriculture, environment, climate change, biodiversity).
- The social role farmers play in the rural world (agriculture, community, rural affairs, mental health, gender).

- The provision of healthy, nutritious foods to communities (agriculture, health, social justice).
- The provision of employment opportunities and personal and professional development (agriculture, education, training, social welfare).

Talamh Beo believe this initiative is exactly the kind of policy framework the CAP should support, along with integrated supports from other areas of government.

Figure 24: Talamh Beo members position on: Do you agree with Talamh Beo’s Local Food Policy being taken forward in the CAP SP?



2. A Rights-Based CAP Strategic Plan

Introduction

Talamh Beo would like to see Ireland develop a rights-based CAP Strategic Plan. Here we want to see the roadmaps outlined in documents like the UN Declaration of the Rights of Peasants and other People Working in Rural Areas (UNDROP³), the Sustainable Development Goals (SDG’s) and the Decade of Family Farms which will run over the same time-period (2019 to 2028) unpacked and create recommendations for a CAP Strategic Plan based on agroecology and the principle of Food Sovereignty - which provides a framework for the democratic reorganization of agricultural and food systems - putting farmers, the land, people and communities at the centre of decision-making.

We understand the term ‘peasants’ is something Irish farmers and society more broadly do not resonate with, however a reading of the definition of peasants in the Declaration is *“any person who engages or who seeks to engage alone, or in association with others or as a community, in*

³ The United Nations Declaration on the Rights of Peasants and other People Working in Rural Areas, 2018

small-scale agricultural production for subsistence and/or for the market, and who relies significantly, though not necessarily exclusively, on family or household labour and other non-monetized ways of organizing labour, and who has a special dependency on and attachment to the land". We believe this definition speaks to the heart of what we know and describe as the 'Irish Family Farm' – small scale producers, family labour and a special dependency on and attachment to the land.

We know peasant agroecological methods and family farming offer ready-made, proven solutions to climate and biodiversity issues. A clear shift of European policy and support for these practices would help avoid the various **human rights, economic and social issues** facing small scale farmers and agricultural and migrant workers.

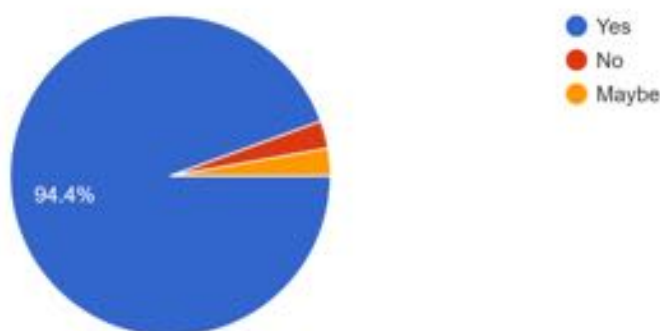
The UNDROP represents an opportunity to **transform food systems in a holistic way**. This tool offers a **ready-made, right-based road map** for EU institutions and Member States to ensure the objectives laid out for the future of EU agriculture, so that they can be achieved in a way that will truly 'leave no one behind'.

We have attached as Appendix 2,

Agroecology is mentioned in the CAP and in the eco-scheme options. Yet there is no agroecological input at any of the tables discussing or designing Ireland's CAP Strategic Plan. This needs to be remedied as a priority. One of the first asks in our CAP SP submission is for Talamh Beo to represent agroecology and its practices of permaculture, holistic, regenerative, organic, and biological farming at these tables as a social partner.

We ask to be given the opportunity to retrospectively feed into the needs assessment and the SWOT analysis and to engage in all processes going forward. We also ask for Talamh Beo women to be given the right to speak for themselves and that they are listened to by the Minister and the Department officials when they raise issues, especially those that present obstacles to them being able to engage equally in farming, farm leadership and to use their land without disturbance.

Figure : Talamh Beo members position on pursuing a rights-based CAP Strategic Plan based on the UN Declaration on Human Rights, the UN Declaration on the Rights of Peasants and other Rural Workers and the Sustainable Development Goals



APPENDIX 1: Talamh Beo's Local Food Policy Framework (2021)

A Local Food Policy Framework

We want everyone in Ireland to have access to high quality, locally produced food. We also want farmers to earn a fair living from providing that food into their communities.

That means creating pathways for local food production through a positive policy framework which incorporates income supports, labour and finance incentives, pilot projects for land access and short supply chain supports and infrastructure.

Why local food producers are important:

Small-scale local food producers selling directly into local markets provide multiple benefits to the local environment, community and economy:

- The production and consumption of food in short chains and webs means increased economic and social activity in rural areas.
- Agroecological growers and producers have a low environmental impact and a small carbon footprint, while providing multiple complimentary benefits.
- Agroecological farming systems have the potential to restore space for local wildlife areas and biodiversity while regenerating ecosystems.
- Local producers marketing their produce directly can supply, fresher, nutrient dense foods directly into local households, meaning better diets for people in the locality.
- Established, functioning local food production systems have the potential to provide increased levels of local employment.
- Locally orientated, diversified farms are relatively resilient to economic instability, and more capable of adapting to uncertainties brought about by climate change and global market fluctuations, pandemics and other supply chain shocks.

The supports outlined here for a local food or seed producer are aimed at levelling the playing field between labour and energy intensive local food producers and a highly subsidised cheap food import/export model. It is time for the added value that comes from local and short chain food systems to be recognised and supported.

A local food policy framework can help build food sovereignty, while increasing community engagement in food systems, from production to distribution. It can also provide the local food production skills and training for a new generation of local food producers.

Food Sovereignty is a framework for building food and agricultural systems which puts land, people and communities first. It looks at how farmers and citizens can work together to find solutions to the common problems of climate change, biodiversity loss and falling farm incomes.

What we need:

- 1. Institutional recognition for Local Food Producers.**
- 2. A Local Food Policy framework.**
- 3. A multi-department, integrated approach to reviving and climate proofing our rural communities.**

1. Institutional recognition for Local Food Producers:

In order to access supports through the Local Food Policy Framework, we propose the creation of a new “Local Food Producer” status for those who meet a given number of criteria. These criteria are outlined below:

What do they produce?

Local Food Producers produce food and seeds in short supply chains for their local community , building food sovereignty and community resilience while reducing the environmental and carbon footprint of our current industrialised and export / import based systems.

- Local Food Producers should produce food (primary production) as their primary economic activity
- Local food producers produce meat, dairy, fruit, veg, honey, mushrooms, seeds and other primary produce for their local community

What is their route to market?

Local Food Producers must show they are supplying local markets and consumers within their area as much as possible. They should be encouraged and facilitated to develop short supply chains when possible.

- Direct sales (Direct sales from farm gate, Community Supported Agriculture, Reko rings, Local Markets, Open Food Network, Cafes, Restaurants etc)
- Wholesale for further resale (Local shops, Supermarkets etc)

How do they produce?

The aim is to produce nutrient dense local food to substitute current imports and reduce the carbon footprint of food, while building soils and regenerating ecosystems.

In many local and short supply chains certification may not be required when there is a strong local relationship and trust between local producer and customer. However, in some cases organic certification should be required:

- Producers marketing direct should use chemical free production methods and agroecological and biological farming systems but do not require certification
- Producers supplying more than 50% wholesale (for further resale by shops etc) should require organic certification.

A Local Food Policy Framework

Outlined below are the crucial supports and actions Talamh Beo believes essential in order to develop and accelerate the growth of our local food systems and short supply chains.

A. Income supports for stimulating local food production:

While many farmers receive payments under the existing system, there are also many farmers who fall between the cracks. This does not make their work any less valuable. In fact, many of the farmers involved in pioneering short supply chains, agroecology, regenerative farming and farming for nature and biodiversity find themselves under-rewarded for their work. Smaller scale farms supplying local markets directly with meat, vegetables, milk or other farm produce are often in receipt of little or no payments.

This puts these local producers at a disadvantage when they are directly competing with a cheap (often subsidised) food model, and means they are not rewarded for the work, time and energy they invest in developing their local community focused food system. The same farms provide social goods such as nutritious food into their communities and biodiverse landscapes for on farm biodiversity as well as contributing to social diversity in rural areas.

Many of these farming models – production for local markets, farming for nature and regenerative farming – are highly valued by citizens and broader society, but the farmers themselves struggle to make a living from their production and many earn far below the average industrial wage. It is time to redress the imbalance in farm payments and introduce a specific payment aimed at supporting and stimulating local production in Ireland.

We propose:

The establishment of a new direct payment linked directly to sales into local markets by registered “local food producers” of up to 15,000 euro per annum.

- “A Local Food Producer” must meet the criteria listed above (sales, produce, routes to market etc) and are paid 50% match funding representing their sales into local markets to

a maximum of payment of €15,000. Local Food Producers must make a minimum of €5,000 of sales, and match funding is paid up until €30,000.

- Example A: Farmer A sells vegetables and fruit valuing €15,000 through a Community Supported Agriculture project. Her Local Producer payment is €7,500 per year.
 - Example B: Farmer B has a mixed farm and sells €5,000 worth of beef direct through a box scheme, his Local Producer payment is €2,500.
 - Example C: Farmer C has a dairy, poultry and pork farm which sells direct as well as to supermarkets and through their website. They have sales of €125,000. Their payment is €15,000.
- The Local Food Producer Payment is not dependent on the BPS system and farmers receiving a direct payment should continue to do so.
 - Organic farmers can receive the Local Food Producer Payment as a top up to their existing organic payments.
 - These sales can be from either food or seed production.

B. Finance

Farmers supplying local markets and establishing new on-farm enterprises for short supply chains (horticulture, poultry, mushroom growing, micro dairying, direct sales of meat etc) often struggle to source effective finance options for their initiatives. Financial institutions serving the farming sector focus on large scale, long-term investments in commodity production and have little or no availability of finance for new entrants, smaller scale operators or new enterprises which do not fit a prescribed format.

It is incumbent on the government to provide a vehicle to help finance new and existing local food start up initiatives with low or zero interest loans backed by government guarantee to support the establishment of new producers in local areas.

We propose:

The establishment of a new finance category for local food producers aimed at stimulating and supporting local, agroecological production on the island of Ireland. This finance category would incorporate loans, VAT and insurance

- Loans would be backed by government guarantee, with low interest rates and have a long term of repayment.
- Loans would be aimed specifically at supporting the establishment of production for short supply chains.
- Loans would be available for small scale primary production infrastructure, machinery and potentially land purchase.

- Insurance: Local Food Producers need insurance equity as many farmers are unable to engage in public events on their farms due to overly expensive insurance costs.
- VAT: Local Food Producers adding value to their own on-farm produce should pay a reduced VAT rate on the sales of those products. Where at least 80% of ingredients are sourced from their own farm.
 - Example: Farmer A makes chutney from her excess fruit and vegetables at the end of the year, and as more than 80% of the ingredients come from her farm, she can charge a lower VAT rate.

C. Labour and social aspects

We need more people on the land growing and supplying our local food systems to ensure our community resilience and future food sovereignty. This requires supporting the direct labour requirements of Local Food Producers and the upskilling of future local farmers by connecting them with existing local producers. We need to be training our local food and seed producers whether they are just starting their journey or are seasoned and established by facilitating the exchange of skills and experience between both.

An ageing farm demographic and rural depopulation mean there is an urgent need to stimulate the local and rural economy in particular. Bringing labour back onto farms for peak periods such as lambing and calving, harvest, haymaking as well as other labour-intensive periods can also mean more opportunities for rural exchange and integration.

We must also acknowledge the role women play in the rural economy and in ensuring functioning farms across the country - work which is largely unacknowledged and unpaid. This is even more evident among single parent farming families and carers who are often bearing the weight of child/elderly care on one income / welfare payment and off one labour unit.

Local food producers have experience and skills to share, with many people currently out of work who need to retrain or find new employment. Local producers offer rewarding work in nature that can also have positive environmental and social benefits.

We propose:

A series of new measures and schemes developed between the Department of Agriculture and the Department of Social Protection which encourage labour activation, retraining and offer pathways for new food producers in local areas.

- Introduce a new “Farmbridge” program which would subsidise employment on farms supplying local markets (registered local food producers). Participants would receive a weekly 250 euro welfare support payment and between 50 and 100 euro from the host farm. Farms would ensure the work also involved a training element.
- Establish a department funded apprenticeship scheme for local food production. The scheme should run for a minimum of 1 year and focus on production for local markets. Participants in the Farmbridge scheme could avail of the apprenticeship scheme as an additional training module.

- Allow Local Food Producers to host participants in the Rural Social Scheme.
- Increase the amount you can earn before a reduction in the Farm Assist payment and streamline this payment for local food producers. The existing system is overly onerous and does not recognize the production and distribution systems used by many small-scale food producers.
- Establish an optional “local food credit” top up for people on low incomes or in receipt of a welfare payment which can only be used to purchase from registered local food producers.
- Build partnership opportunities for Local Food Production between older farmers and new entrants.

D. Access to Land and Young Farmers

For new entrants not from established farming families, land can be the first barrier to establishing a new local food production business. At the same time an ageing farming population looks for solutions to ensure the continuity of people on the land. Every rural townland wonders how many farmers will still be around in twenty years time.

In order to develop a coherent local food policy framework, access to land is vital, particularly for young and new entrants into farming. Local Food Production also offers an opportunity for older farmers to share their valuable skills with a new generation, and ensures the continuity of farms and their viability, further benefiting rural communities.

We propose:

The development of a land access strategy incorporating social innovation, farm organizations, community groups, local authorities and a new Irish Land Trust all working to develop local agroecological food production in Ireland

- Claims for land payments through the CAP should be limited to 32 hectares to discourage hoarding of land or absentee ownership.
- Establish a public land purchase mechanism to give first option to local farmers/communities when land in their area is placed on the market in order to prevent land concentration and absentee ownership.
- Introduce long term leases specifically orientated for agroecological farming.
- Public bodies/local authorities should make existing land they own or if needed acquire land and make it available for long leaseholds for agroecological farming projects in urban areas.
- Land availability for young farmers: make small plots available through CAP - provide a payment to lease land for agroecological food production on a per hectare basis to

encourage more availability of land in rural areas for local food production.

- The establishment of a voluntary land trust which takes land into trust and facilitates long term leases to new entrants for agroecological food production, as well as supporting inter-generational land transfer.

E. Short supply chains

Short supply chains are key to the development of a functioning local food system. Short supply chains are built on trust and citizen participation – bringing people closer to where their food comes from and a deeper awareness of how it is produced. Short supply chains offer multiple social, environmental and economic benefits while building community cohesion, stimulating rural networks, reducing isolation and above all providing high quality, nutritious food to communities, towns and cities across the country.

However, short supply chains can also place high levels of organizational work on the shoulders of farmers, who work to educate citizens in new systems for purchasing food. New entrants to local food systems also struggle to identify the best short supply chain option for their farm, and farmers may lack expertise in organizing distribution, creating a bottleneck for local food systems. It is important that farmers have access to the right information in order to develop the best model for their local food initiative. Community Supported Agriculture, Food Hubs, Reko, Food Collection, Country Markets, Farm Shops, social media drop off points and the Open Food Networks are all direct sales options being developed around the country which would benefit from active government support.

We propose:

The establishment of Community Food Hubs which have a Local Food Facilitator who works to build links between farmers and consumers. Community food hubs would include representatives who are local food producers. Community Food Hubs would also organise public procurement for local producers as part of a community wealth building strategy.

- Establish and fund a mentoring scheme which links farmers to new entrants, providing education on routes to market and running short supply chains effectively.
- Food hubs would provide information on supports and funding for farmers developing short supply chains, as well facilitating training peer to peer learning.
- Local authorities should fund Local Food Facilitators set up and support short supply chains by linking farmers to consumers and providing spaces for distribution.
- Establish New market trading laws and funding for local authorities to establish outdoor market trading areas in towns and villages. These covered areas can double up as outdoor events spaces.
- Organise public procurement as part of a community wealth building strategy.

3. A multi-department, integrated approach to reviving and climate proofing our rural communities

The Local Food Policy Framework incorporates multiple social, economic and environmental benefits. As such it is relevant not just to the Agricultural sector but also, Health, Social Protection, Education, Local Authorities and other bodies.

This diversity of potential benefits could benefit from an integrated approach to the development of a Local Food Policy Framework.

- Impact of production (agriculture, environment, climate change, biodiversity).
- The social role farmers play in the rural world (agriculture, community, rural affairs, mental health, gender).
- The provision of healthy, nutritious foods to communities (agriculture, health, social justice).
- The provision of employment opportunities and personal and professional development (agriculture, education, training, social welfare).

Short supply chains provide benefits in reducing emissions from transport, cold storage and other emissions costs related to long supply chains, and local food production is almost always undertaken on farms which prioritize agroecology, biodiversity and regeneration of ecosystems.

A revival of this sector would allow citizens to further engage in environmental protection, increasing awareness of the impacts of harmful agricultural practices and building a sense of shared ownership of the natural world and our duty to protect it.

One of people's instinctive reactions when confronted with the challenges of climate change and biodiversity loss is to return to local provision – that collective intelligence should be rewarded with investment in a sector which has so many obvious benefits to citizen health, ecosystem health and rural livelihoods.

A local food policy framework can provide a roadmap for a new generation of farmers and landowners who can develop livelihoods while providing positively for the community. Farmers need to be part of the change - in order to climate proof our farms we need to:

- Recognise that the most consistent and important market of all is the local market
- Create new opportunities for sustainable farm livelihoods in rural areas

- Work with farmers to introduce them to alternative ecological and biological solutions that they can implement into their existing farming practices
- Help farmers adapt to these challenges using nature based ecological and biological farming methods.
- Reduce or replace high cost industrial and oil based inputs.
- Help our farmers re-imagine a new way of farming for the future, which will re-inspire the next generation to return to the land and our rural communities.

We want more farmers in Ireland - and to ensure the valuable work done by many farmers on marginal or smaller holdings is recognised and can continue. This also means ensuring the specific challenges faced by some farmers, particularly women farmers are addressed and their farms defended and secured for the future.

APPENDIX 2: What the UNDROP provides for Family Farmers and People Working in Rural Areas

We have removed the word Peasant and replaced it with the words Family Farmers. These are the rights accorded to peasants / family farmers and people working in rural areas under UNDROP. This is the foundation upon which we wish to see Ireland's CAP Strategic Plan process and final document built on:

1. Respect, protect and fulfil the rights of family farmers and other people working in rural areas⁴.
2. Pay particular attention to the rights and special needs of family farmers and other people working in rural areas, including older persons, women, youth, children and persons with disabilities, taking into account the need to address multiple forms of discrimination.
3. Reflect consultation and co-operation in good faith with family farmers practicing agroecology, including: listening to their needs assessment, their contribution to the CAP SP SWOT analysis, their suggestions for eco-schemes, their suggestions for incentivising gender equality and any other CAP / agricultural policy related issues.
4. (Regarding women and gender equality)
 - a. Acknowledge that Women family farmers and the issues specific to them are currently not represented in the CAP consultative process, nor are they or their specific issues represented at any agricultural policy forums. This is in part due to the culture of the existing farm representative bodies having exclusively or predominantly male National Executives / lobby groups reflecting their patriarchal interests and understanding of issues; and in part due to the historic role of women organising in the agricultural sector around country markets (ICA) but not in politics or policies.
 - b. This acknowledgement of the absence of women and their specific issues needs to include a commitment to fully bring women into the decision-making processes so they can participate equally and effectively in the formulation and implementation of development planning at all levels to allow them to freely pursue, participate in and benefit from rural economic, social, political, and cultural development.
 - c. This (b) includes but is not limited to:

⁴ Family farmers and other people working in rural areas have the right to the full enjoyment of all human rights and fundamental freedoms recognized in the Charter of the United Nations, the Universal Declaration of Human Rights and all other international human rights instruments. This includes the right to determine and develop priorities and strategies to exercise their right to development.

- i. To receive all types of training and education, whether formal or non-formal, and to benefit from all community and extension services in order to increase their technical proficiency.
 - ii. To organize self-help groups, associations and cooperatives in order to obtain equal access to economic opportunities through employment or self-employment.
 - iii. To have equal access to financial services, agricultural credit and loans, marketing facilities and appropriate technology.
 - iv. To equal access to, use of and management of land and natural resources, and to equal or priority treatment in land and agrarian reform and in land resettlement schemes.
 - v. To decent employment, equal remuneration and social protection benefits, and to have access to income-generating activities.
 - vi. To be free from all forms of violence.
5. Family farmers and other people working in rural areas have the right to have access to and to use in a sustainable manner the natural resources present in their communities that are required to enjoy adequate living conditions. They also have the right to participate in the management of these resources.
 6. The establishment of organisations of family farm producers including Producer Organisations / co-operatives etc and to ensure the qualifying criteria is appropriate to scale.
 7. The establishment of appropriate measures to promote the access of family farmers and other people working in rural areas to a fair, impartial and appropriate system of evaluation and certification of the quality of their products at the local, national and international levels, and to promote their participation in its formulation. For agroecological farmers, this includes certifications like 'organic', 'Environmental Outcomes Verification' and other similar certifications being developed.
 8. An acknowledgement that family farmers and other people working in rural areas have the right to effective and non-discriminatory access to justice, including access to fair procedures for the resolution of disputes and to effective remedies for all infringements of their human rights. Such decisions shall give due consideration to their customs and traditions
 9. An acknowledgement that family farmers and other people working in rural areas have the right to work, which includes the right to choose freely the way they earn their living. As Ireland has less industry and thus less employment opportunities in other sectors, it relies substantially on the agricultural sector as an employer or livelihoods provider to farm families. States shall take appropriate measures to establish and promote sustainable food systems that are sufficiently labour-intensive to contribute to the creation of decent employment.

10. An acknowledgment that family farmers and other people working in rural areas, irrespective of whether they are temporary, seasonal or migrant workers, have the rights to work in safe and healthy working conditions, and to participate in the application and review of safety and health measures.
11. Family farmers and other people working in rural areas have the right to determine their own food and agriculture systems, commonly described as the right to food sovereignty. This includes the right to participate in decision-making processes on food and agriculture policy and the right to healthy and adequate food produced through ecologically sound and sustainable methods that respect their cultures. The Department shall formulate, in partnership with family farmers and other people working in rural areas, public policies at the local, national, regional and international levels to advance and protect the right to adequate food, food security and food sovereignty and sustainable and equitable food systems that promote and protect the rights of family farmers and other people working in rural areas.
12. Family farmers and other people working in rural areas have the right to an adequate standard of living for themselves and their families, and to facilitated access to the means of production necessary to achieve them, including production tools, technical assistance, credit, insurance and other financial services.

They also have the right to engage freely, individually and/or collectively, in association with others or as a community, in traditional ways of farming, fishing, livestock rearing and forestry and to develop community-based commercialization systems.

States shall take appropriate measures to favour the access of family farmers and other people working in rural areas to the means of transportation, and processing, drying and storage facilities necessary for selling their products on local, national and regional markets at prices that guarantee them a decent income and livelihood.

States shall take appropriate measures to strengthen and support local, national and regional markets in ways that facilitate, and ensure that family farmers and other people working in rural areas have, full and equitable access and participation in these markets to sell their products at prices that allow them and their families to attain an adequate standard of living.

States shall take all appropriate measures to ensure that their rural development, agricultural, environmental, trade and investment policies and programmes contribute effectively to protecting and strengthening local livelihood options and to the transition to sustainable modes of agricultural production.

States shall stimulate sustainable production, including agroecological and organic production, whenever possible, and facilitate direct farmer-to-consumer sales.

States shall take appropriate measures to strengthen the resilience of family farmers and

other people working in rural areas against natural disasters and other severe disruptions, such as market failures.

States shall take appropriate measures to ensure fair wages and equal remuneration for work of equal value, without distinction of any kind.

13. Family farmers and other people living in rural areas have the right to land, individually and/or collectively, including the right to have access to, sustainably use and manage land and the water bodies, coastal seas, fisheries, pastures and forests therein, to achieve an adequate standard of living, to have a place to live in security, peace and dignity and to develop their cultures. States shall take appropriate measures to provide legal recognition for land tenure rights, recognizing the existence of different models and systems. States shall protect legitimate tenure and ensure that family farmers and people who work in rural areas rights are not otherwise extinguished or infringed. States shall recognize and protect the natural commons and their related systems of collective use and management.
14. Where appropriate, States shall take appropriate measures to carry out agrarian reforms in order to facilitate broad and equitable access to land and other natural resources necessary to ensure that Family farmers and other people working in rural areas enjoy adequate living conditions, and to limit excessive concentration and control of land, taking into account its social function. Landless farmersff, young people, small-scale fishers and other rural workers should be given priority in the allocation of public lands, fisheries and forests.
15. States shall take measures aimed at the conservation and sustainable use of land and other natural resources used in their production, including, among others, through agroecology, and ensure the conditions for the regeneration of biological and other natural capacities and cycles.
16. Family farmers and other people working in rural areas have the right to the conservation and protection of the environment and the productive capacity of their lands, and of the resources that they use and manage. 2. States shall take appropriate measures to ensure that family farmers and other people working in rural areas enjoy, without discrimination, a safe, clean and healthy environment.
17. States shall comply with their respective international obligations to combat climate change. Family farmers and other people working in rural areas have the right to contribute to the design and implementation of national and local climate change adaptation and mitigation policies, including through the use of practices and traditional knowledge.
18. Family farmers and other people working in rural areas have the right to seeds, including the right to maintain, control, protect and develop their own seeds and traditional knowledge. States shall recognize the rights of Family farmers to rely either on their own seeds or on other locally available seeds of their choice, and to decide on the crops and species that they wish to grow. States shall take appropriate measures to support peasant seed systems and

promote the use of peasant seeds and agrobiodiversity. States shall ensure that seed policies, plant variety protection and other intellectual property laws, certification schemes and seed marketing laws respect and take into account the rights, needs and realities of Family farmers and other people working in rural areas.

19. States shall take appropriate measures to promote and protect the traditional knowledge, innovation and practices of family farmers and other people working in rural areas, including traditional agrarian, pastoral, forestry, fisheries, livestock and agroecological systems relevant to the conservation and sustainable use of biological diversity.
20. Family farmers and other people working in rural areas have the human rights to safe and clean drinking water and to sanitation, which are essential for the full enjoyment of life and all human rights and human dignity. These rights include water supply systems and sanitation facilities that are of good quality, affordable and physically accessible. States shall respect, protect and ensure access to water, including in customary and community-based water management systems, on a non-discriminatory basis, and shall take measures to guarantee affordable water for personal, domestic and productive uses, and improved sanitation, in particular for rural women and girls, and persons belonging to disadvantaged or marginalized groups, such as nomadic pastoralists, workers on plantations, all migrants regardless of their migration status, and persons living in irregular or informal settlements.
21. States shall protect and restore water-related ecosystems, including mountains, forests, wetlands, rivers, aquifers and lakes, from overuse and contamination by harmful substances, in particular by industrial effluent and concentrated minerals and chemicals that result in slow and fast poisoning.
22. Family farmers and other people working in rural areas have the right to adequate housing. They have the right to sustain a secure home and community in which to live in peace and dignity, and the right to non-discrimination in this context.
23. Family farmers and other people working in rural areas have the right to adequate training suited to the specific agroecological, sociocultural and economic environments in which they find themselves. Issues covered by training programmes should include, but not be limited to, improving productivity, marketing, and the ability to cope with pests, pathogens, system shocks, the effects of chemicals, climate change and weather-related events. States shall encourage equitable and participatory farmer-scientist partnerships, such as farmer field schools, participatory plant breeding, and plant and animal health clinics to respond more appropriately to the immediate and emerging challenges that Family farmers and other people working in rural areas face. States shall invest in providing training, market information and advisory services at the farm level.