



IRISH CATTLE AND SHEEP FARMERS' ASSOCIATION

Submission  
on  
Farm Safety

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## **Introduction**

The fact that 30 people died in farm-related accidents in 2014 has led to a renewed focus on how the issue of farm safety should be tackled. While fatalities grab the headlines, there is an underlying issue about the level of serious and less serious injuries associated with farm activities. Finally, the issue must be considered in the wider context of overall health, safety and well-being. In this regard, an examination of fatality and injury statistics is important but there is a need to have a broader understanding of patterns of ill-health, stress and premature mortality associated with farming activity.

## **Understanding the problem – statistics, research findings and evidence**

ICSA submits that much of the commentary on farm fatalities is based on a relatively narrow and inappropriate level of statistical information. The shortcomings include:

- Comparing agriculture figures with other sectors such as manufacturing, retail, professional or construction. This is comparing apples and oranges. The difference between single-operator farming scenarios and multi-million euro manufacturing facilities is substantial. Manifestly, a farm cannot be compared to an office. Even a comparison with construction is meaningless in that construction sites do not have the unpredictability of livestock.
- The only worthwhile and meaningful assessment of where we are at is to compare farms here with similar farms in other EU member states. ICSA has looked for statistics to make the comparison but has found difficulty in obtaining figures such as the level of fatalities per 100,000 of population. Our general understanding is that Irish farm fatalities are neither better nor worse than comparable EU averages.
- While a figure of 30 fatalities in 2014 is high relative to the long-term average, incidents involving fatalities are relatively small in absolute terms. Random factors can cause a relatively big swing in the annual fatalities but may or may not indicate a general improvement/dis-improvement in health and safety.
- The picture would be clearer if there was a reliable set of figures to indicate trends in broader accident/injury rates, but such evidence is not readily available and comparisons can be difficult. Nonetheless, there is a case for more research and documentation of hospital visits etc. to better understand the underlying trend.
- An example of the difficulties associated with putting too much emphasis on fatality figures is that the 2014 figure of 30 fatalities is the highest in over 20 years but the previous year was well below average at 16. Moreover, fatality numbers had fallen in each consecutive year from 2010 to 2013. The point is that one exceptionally bad year does not confirm a trend.

## **Problems associated with age**

Of the 30 fatalities in 2014, six were aged in their 70s and four were aged in their 80s. 50% of fatal accidents in 2011 involved farmers over 65 years old. For five out of the past ten years, fatalities involving over 65s have accounted for in excess of 40% of fatalities for the year in question and there was only one year in ten when the over 65s category was less than

20% of all fatalities. Obviously, in other sectors, retirement policy would preclude people of this age continuing to work.

The implication might be that older farmers should retire or be required to retire but this would be utterly wrong in ICSA's view. Older farmers are obviously more vulnerable to livestock, and perhaps more at risk of catastrophic accident where a younger farmer might be agile enough to escape. However, this is counterbalanced by the reality that farmers who continue to be active in their later years derive benefit from it in terms of physical fitness and mental well-being.

Let us consider a brief cost/ benefit analysis of banning all over 65s from farming activity.

We could surmise that 10 older farmers would not have been part of the 2014 statistics, an undoubted benefit. However, the cost could be much higher in terms of farmers dying earlier due to losing the benefits of regular outdoor exercise, the mental challenge of being occupied and interested in farming and the increased likelihood that, without a reason to get up in the morning, some would end up in nursing homes with a lower quality of life from their perspective.

There are many examples of farmers who derive tremendous benefit from continuing to work and who derive benefit from ongoing involvement in a farm business.

Unquestionably, the ideal model is where an older farmer retains an involvement but is farming alongside a young farmer, either a successor or a farm partner. However, this is often not possible. In some cases, there is no successor but in many situations poor income prospects from farming mean that the potential successor has no choice but to work off-farm and in many cases, migrate to cities or abroad.

Better facilities for handling animals are a necessity, but the reality may often be that the most vulnerable, older bachelor farmer does not have sufficient income to tackle every deficiency.

The improvement of tax incentives to encourage long-term leasing and the emerging focus on farm partnerships may lead to some older farmers moving away from farming on their own into old age and these initiatives are to be welcomed.

**Conclusion: The prevalence of older farmers continuing to farm into their seventies and eighties, often in solitary circumstances, contributes to the higher fatality statistics for farming. However, retired people are regularly exhorted to have an "active retirement" and ICSA submits that the tragedy of individual fatality cases must be viewed in the context of the tremendous health benefits, both physical and mental, derived by many farmers from continuing to farm in later years. A key problem is not that they are farming but that they have no assistance from younger successors or neighbours and this reflects on the failure of policy and market to deliver adequate income. Initiatives to encourage partnerships or long-term leasing will be helpful and should be supported.**

## **Problems associated with solitary working arrangements**

One approach to farm safety is to enforce industrial or construction site standards on farm workplaces. However, it is necessary to consider that the norms of work practices in factories, offices or construction sites are generally influenced and facilitated by the number of people present at work. The advantages of specialisation and well-defined job roles allow an approach that is not easily replicated on a farm. Moreover, workers can prioritise safety over almost any other consideration. On-farm considerations such as economic viability, animal welfare or weather risks weigh heavily on a farmer working on his/her own with no opportunity to pause and consult with a fellow worker.

There is little doubt that a huge amount of the work carried out on a farm by a solitary individual would not be permitted in an industrial setting or building site. In the industrial setting, it would be reserved for teams of two or more workers and, in many cases, specialised equipment with appropriate training would be required. Thus, for example, carpenters do not erect scaffolding.

The nature of farming requires each individual farmer to be a jack-of-all-trades. The relentless squeezing of farm incomes over the years means there is less and less opportunity to hire in outside help.

Where a machine breaks down and the weather is due to break, there is immense pressure to get it fixed instantly. Even if a call-out repair service is available, it is typically unavailable when every farmer wants to make hay today and all breakdowns are urgent. Hence, farmers get stuck in themselves.

## **Problems associated with animal behaviour**

A typical example is the challenge of working with freshly calved animals, which are notoriously unpredictable and frequently highly dangerous. Top-class animal handling facilities such as calving gates are prescribed and certainly have a role to play.

However, such facilities have limitations. The farmer has to get the animal into the facility, which may be a danger point. This could happen where a farmer has animals calving outdoors, which generally has significant advantages as well as challenges. After calving, the animal has to be released to become familiar with the newborn calf. After a while, if the calf has not suckled sufficiently, then the farmer must intervene or the animal dies.

It is easy to say afterwards that the farmer should put his own life before that of the animal but the reality is that a farmer who does not intervene on a regular basis will have a lot of dead animals. No farmer wants that and regulatory authorities would undoubtedly question a high incidence of animal deaths.

Alternatively the new born calf and its mother must be moved out of the calving facility to make way for another and this poses risks. The risk is multiplied when a farmer is at peak calving time and several calvings are happening within 24 hours. Exhaustion can also be a

factor. However, for most farmers the peak calving season requires working eighteen hours shifts or maybe seventy-hour weeks.

The economics of suckler farming and even of dairying in many cases, do not allow for shift work such as pertains in factories where a three-cycle shift might be employed.

Aside from calving, there is always a risk attached to animals and in some cases it is next to impossible to foresee. In 2014 a farmer was killed when her own animals stampeded across a field and trampled her and another woman, having been startled by cats.

It is also the case that the huge number of suckler cows combined with part-time farming is creating potential risk. Almost uniquely in Europe we have as many suckler cows as dairy cows. All of these suckler-derived animals are especially wild and unpredictable. Part-time farming due to low incomes increases still further the incidence of dangerous cattle that are not used to human interaction.

### **What Can Be Done?**

One of the challenges in finding solutions is that there are so many variables when it comes to farm accidents, and yet the evidence on how to prevent them is grossly insufficient.

We have no reliable understanding of what is going on where accidents happen except in the case of fatalities.

When we look at fatalities, we see a multiplicity of circumstances, involving various factors ranging from machinery to animals to slurry gas to electrocution.

The HSA statistics for 2005-2014 show the variety of causes. (Table 1)

**Table 1**

<b>Rank</b>	<b>Major Causes</b>	<b>No of Fatalities</b>	<b>% of fatalities</b>
1	Tractors & Farm vehicles	58	30%
2	Machinery	36	19%
3	Livestock	26	13%
4	Drowning/Gas	22	11%
5	Falls from height	17	9%
6	Falling objects/collapses	14	7%
7	Timber related	13	7%
8	Electrocution	3	2%
9	Others	4	2%

Table 1 shows that there is no easy one-fix solution. It would seem that upgrades to buildings, animal handling facilities, machinery, tractors and other vehicles, better agitating arrangements for slurry etc are all indicated.

However, it is also a simple fact that on many farms the income simply does not exist to do all of this unaided. Tractors and machinery need regular repair and upgrade but on many

farms vehicles are old by economic necessity. However, it is not clear that all of the accidents involving vehicles relate to deficiencies. In many cases, driver error is at fault.

PTOs are regarded as lethal and have caused horrendous deaths and mutilation. However, there was no fatality in 2014 linked to a PTO deficiency. This is not to suggest that PTOs should be ignored, but it does indicate that machinery-related problems are many and varied.

It is not only with the farmer that culpability lies. PTO shafts are often not fit for purpose. Farmers regularly report the chains on PTOs breaking within months of purchase. This is a product deficiency. There is need for pressure on machinery manufacturers to improve the specs and quality of agricultural machinery.

## ICSA Proposals

1. **Education of children:** Farm safety needs to be on every primary school curriculum in rural areas.
2. **Financial Issues:** Much more reflection on low incomes in farming is required by policy-makers at EU and national level. It is unacceptable that the EU Commission or the Government would threaten cuts to EU supports for safety shortcomings when general reductions to farm incomes caused by policy decisions (eg closure of REPS, reduction in Pillar 1 payments, insufficient action against multinational retailers taking more margin from product) are making it harder for farmers to make sure that all facilities and equipment are top-class. ICSA submits that a cut to supports actually worsens the problem. Instead, extra funding for farm safety grants is required, particularly given that the most recent scheme has been over-subscribed.
3. **Discussion Groups:** Discussion groups are proving to be far more effective means of transferring knowledge than lectures from professionals. Therefore, they should be used to help improve farm safety awareness through peer discussion of risks on each farm. ICSA believes that HSA inspectors could be utilised to stimulate the discussion in each group and farmers would learn from each other.
4. **Ongoing Education and Awareness through Farm Organisations and Teagasc:** The discussion group route as described above is the ideal but this does not mean that farm organisations and Teagasc have no role. They can ensure that farm safety is on the agenda for as many meetings as possible and that the message on farm safety is promoted through all channels.
5. **Minimising stress and prioritising mental health issues:** Every effort should be made to minimise stress on farmers. The Department must endeavour to reduce or eliminate unannounced inspections where possible. Farmers should not have to endure delayed payment of EU supports due to bureaucratic technicalities. All state interventions must recognise the severe financial strains on many farmers and cash flow problems. While we have statistics on farm fatalities from accidents, we don't know whether or not stress is actually a greater source of death on-farm.

## **Commentary Re On-the-Spot Fines**

### **Children under 7 on tractors:**

ICSA disagrees vehemently with this, provided the child is in a modern tractor with an enclosed cab and proper seating with a safety belt. The evidence does not show child fatalities in tractor cabs but it does show that children out of the tractor have been killed.

### **Faulty PTO shafts:**

ICSA believes that manufacturers should be required to provide a five year guarantee with PTO shafts as too many fail within twelve months. The Government should allow a VAT rebate for flat-rate farmers or provide grants for PTO upgrades.

### **Unfenced slurry pits:**

Slurry pits should be well fenced. However, it can be costly for farmers with income issues and ICSA believes that fines are only fair if there is a grant system available to tackle the job.