

Public Consultation on the Environmental Assessment of the Draft Agri-Food Strategy to 2030

Beyond the Parlour Dairy Discussion Group

June 14th, 2021

1 Beyond the Parlour Discussion Group

Beyond the Parlour is a dairy discussion group of open-minded progressive dairy farmers who have come together to educate ourselves on the current issues within agriculture. As we become better informed, our aim is to be a constructive and positive influence on the dairy industry in Ireland.

2 Our thoughts on the draft Agri-Food Strategy 2030

We would first like to thank the authors for their hard work in compiling an ambitious strategy for the Agri-Food sector for the next decade. We acknowledge that the key goals laid out in previous food strategies have generally been met and sometimes even exceeded by the dairy industry (e.g., the 50% increase in milk production envisioned in Food Harvest 2020), resulting in a prosperous period for dairy farmers throughout the country since the abolition of milk quotas in 2015. We acknowledge the importance of this new strategy for the dairy farmers of Ireland and therefore feel a requirement on our behalf to contribute to the public consultation process. The following sub-sections set out our opinions on three of the main high level targets outlined in the draft Agri-Food strategy 2030. Overall, the strategy has set some exciting and achievable targets, but some need adjustment so it can be mutually beneficial and realistic for farmers and policy makers.

2.1 Biogenic methane reduction of a minimum of 10% by 2030

We recognize that methane is currently the most abundant Greenhouse Gas (GHG) emitted by Irish agriculture. According to Teagasc, 58% of Irish agricultural emissions come from methane produced during enteric fermentation while another 10% of agricultural emissions come from methane produced during slurry storage. Therefore methane accounts for approximately 68% of all Irish agricultural GHG emissions. In order to reduce Ireland's agricultural Carbon footprint, we acknowledge that the quantities of methane emitted from the dairy herd must be addressed. We stress however, that it is only worthwhile attempting to reduce our methane emissions, if and only if we can ensure that no Carbon Leakage (whereby another country with less strict climate policies produce more methane as a result of our actions) takes place as a result. Otherwise, the exercise is pointless from a global GHG perspective and probably even damaging because Irish livestock farming is one of the most efficient, in terms of Carbon emitted per kilogram of milk solids/beef.

To ensure that no Carbon Leakage takes place while attempting to reduce our methane emissions, technological solutions must be the answer. Currently, there is considerable scientific research being undertaken into methane mitigation techniques from livestock both nationally and internationally. Much of this research is looking into techniques such as feed additives and advancements in livestock genetics (see for example Teagasc's METHLAB research project). Although, this research is promising, it unfortunately is in its infancy. The draft Agri-Food Strategy 2030 in its current form sets a hard target in both methane reduction amounts and date (i.e., 10% reduction on 2018 levels by 2030). The glaring problem with such a stringent deadline and goal is that technological solutions may not be mature enough by the end of this decade to reach this target and that a partial cull of the national herd would then be the only solution to reach the target. As a progressive group of dairy farmers, many of whom have aspirations to develop and increase their

herd size over the next decade, this generic target reduction in methane seems like a very serious threat to our business plans. Given the immense value of the dairy industry to both the local and national economy and considering that dairying is the only agricultural sector which is not reliant on subsidies for survival we feel that it should be explicitly stated in the final Agri-Food strategy document that the reintroduction of milk quotas (i.e., some form of a cull on the dairy herd) should be the very last method used to reduce our methane emissions by 10% by 2030.

If technological solutions cannot be found to reduce our methane production then there are a number of difficult questions that the Agri-Food committee must answer before they include this methane reduction goal in their report. What happens if the national herd population begins to rise again over the next few years? In Figure 1 we have plotted the CSO figures for the national herd population between 1975 and 2020. It can be seen that the national herd has been more or less static over the last 5 years (i.e., the reduction in the suckler cow population has compensated for the growth in dairy cow numbers.). It would seem likely that dairy cow numbers will continue to naturally increase over the years ahead because of their economic return, but there is no guarantee that the less economically viable suckler cows will continue on their downward trajectory. If the national herd then rises over the next few years technological solutions may not be sufficient or mature enough to compensate for this possible growth this decade. **Transparency from the Agri-Food committee now is a must, or we face a cliff edge end to this decade where the national herd could have to undergo a severe cull to meet a 10% methane reduction.**

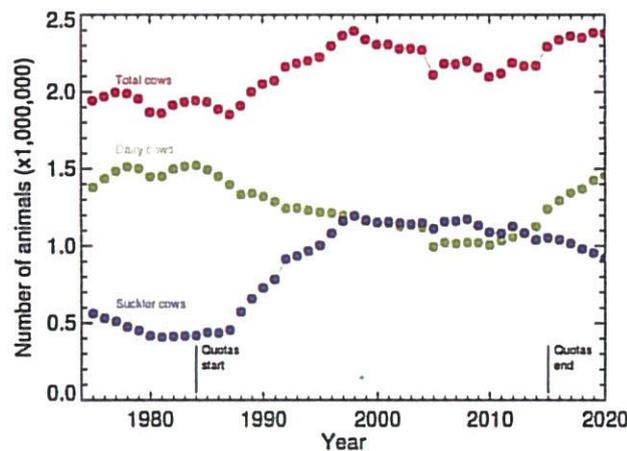


Figure 1: The national cow herd between 1975 and 2020. Despite the relatively large increase in dairy cow numbers since the abolition of milk quotas in 2015, the dairy herd today is approximately the same size as it was in the late 70s and early 80s. Data taken from the CSO.

As a progressive group of dairy farmers who believe that we produce some of the most Carbon efficient dairy products in the world, we are convinced that we should be allowed to continue to increase our production over the next decade. We therefore have looked into two realistic cases whereby we continue to expand our dairy herd over the next decade (in case 1 by 20% on 2018 levels and in Case 2 by 10%) and the current 10% reduction in methane target set out in the draft Agri-Food strategy is also reached by 2030. The results are shown in Figure 2 and can be summarized as follows: Case 1 requires the suckler herd to decrease by a staggering 80% while case 2 requires it to decrease by a smaller but still significantly large 56%. **Such simple analysis has not been discussed in the draft Agri-Food strategy, even though the issues raised (i.e., rising national herd and no technological solutions to methane mitigation) above are very possible. We firmly believe that these scenarios must be included and discussed in the final strategy.**

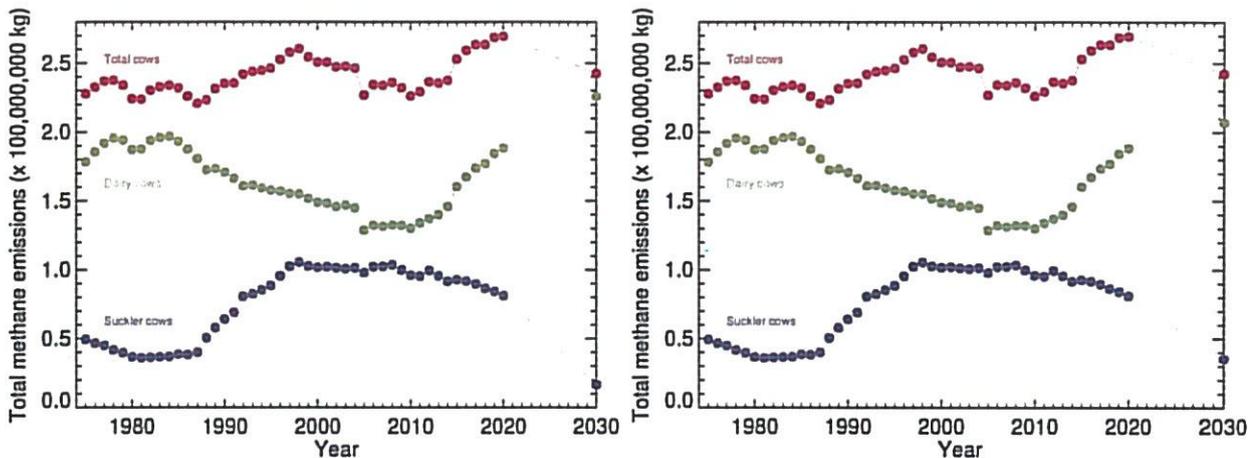


Figure 2: *Left*: Total methane levels are reduced by 10% by 2030 but the dairy herd expands by a further 20% (Case 1). *Right*: Total methane levels are reduced by 10% by 2030 but the dairy herd expands by a further 10% (Case 2). Cow numbers have been taken from the CSO and the methane conversion factors have been taken from O'Meara (2006).

2.2 Agriculture will reduce nutrient losses to water by 50% by 2030

The draft Agri-Food strategy 2030 sets a target of reducing agricultural nutrient losses to water by 50% by 2030. To achieve this a focus must be placed on ensuring that all farms cooperate in improving various on-farm practices and in some cases, improving facilities on-farm. **Incentives and support measures must also be considered to help make this happen.**

Below are points that need to be addressed if this goal is to be achieved:

Slurry storage. One of the main risks to water bodies is slurry capacity on farms. Research in the Teagasc Agricultural Catchments Programme show that losses of nutrients to watercourses on a given day during the winter period, is 4 times higher than in summer, even when both days have similar rainfall. Any new construction of a slurry tank/store should look beyond meeting minimum requirements. An additional 20% storage for dairy cows and 10% for dry stock farms would give farmers more scope in the spring time. This would reduce the pressure on farms to spread during times of inclement weather and provide a coping mechanism to deal with wet spring weather. Currently, farmers who do not have adequate slurry storage on their farm cannot avail of a TAMS grant to increase storage as they are non compliant. This creates major difficulty in solving slurry capacity on farms and puts young farmers in particular at a disadvantage.

Soiled water. Soiled water must have a biochemical oxygen demand of less than 2500mg/l or a dry matter content of less than 1% (10g/l). Soiled water is an issue for water quality because of the nutrients and sediment it carries. Incentives and advisory programmes such as ASSAP in Teagasc should be made available to all farmers to improve farms in this area.

Drinking access for stock. All farms should be required to fence stock away from waterways - not just derogation farms. Exclusion of cattle from watercourses can help improve the quality of environmental indicators over the short and long term. Incentivising provision of alternative water supplies, to avoid the need for cattle to access watercourses for drinking water, should be considered. Grant aid under TAMS should be made available for solar water pumps to allow farmers provide stock with drinking water without entering waterways. **All farms should be treated as equally capable of causing pollution in waterways - not just those in derogation.** Currently derogation farms are subject to far more regulations and on-farm inspections. Lowly stocked farms still have a significant capability to pollute water-ways. Every farm should be required to fence stock away from waterways, adhere to buffer zones when spreading

manure, have adequate slurry storage capacity and ensure that silage effluent and run-off from farm yards does not make its way into water bodies.

2.3 10% of farmed area prioritised for biodiversity, spread across all farms throughout the country, by 2030

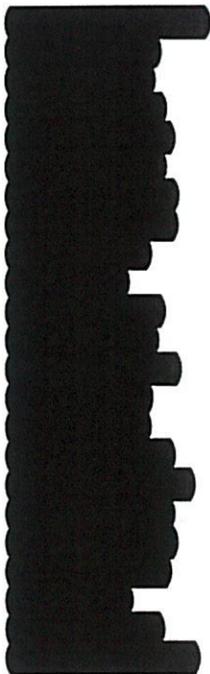
Farmers are the original "environmentalists" and have been adopting new technologies and practices that care for the world around them for many years. One of the core targets of the Agri-Food strategy 2030 is to have 10% of farmed area prioritised for biodiversity spread across all farms by 2030. **Although this target seems laudable at first, we don't see it as an achievable one. It is a target that would have a massive effect on the profitability and sustainability of all dairy farms throughout the country.**

According to the Teagasc national farm survey 2019, the average dairy farm milked 80 cows on a milking platform of 58.3 hectare and had an average net income €1,118 per hectare. If 10% of this area was to be fully prioritized for biodiversity it would cost the average dairy farmer €6,517 or €81 per cow. This cost could prove detrimental to dairy farmers across Ireland after a period of expansion/borrowing. This may also cause a higher reliance on purchased concentrates (much of which is imported with a larger Carbon footprint than locally produced feed) as most farmers would be slow to reduce stock numbers and supplement with other feed as more land is set aside for biodiversity.

There is no concrete, stepwise approach laid out in the Agri-Food strategy to help farmers achieve this 10% biodiversity target. More importantly, **no consideration has been given into the economical impacts. This section lacks any clarity in how farmers can achieve 10% of farmed area for biodiversity within the next 8 years while having no economic impact on their business.** It seems targets have been set without the requisite research carried out on how to execute them.

"A goal without a plan is just a dream".

Sincerely,







**Composting & Anaerobic Digestion
Association of Ireland**

Submission to the

Department of Agriculture, Food & Marine

On

Draft Ag Food Strategy

From:

**Cré – Composting and Anaerobic Digestion
Association of Ireland**

June 15th, 2021

CONTENTS

1. INTRODUCTION 1

2. CONSULTATION QUESTIONS & CRÉ'S RESPONSES 2

1. Introduction

Cré welcomes the opportunity to comment on the public consultation on the draft Ag Food Strategy.

About

Established in 2001, Cré is the Composting and Anaerobic Digestion Association of Ireland. Cré (which is the Irish word for 'soil'), is a non-profit association of public and private organisations, dedicated to growing the biological treatment sector. Cré supports the production of high-quality outputs, assists the delivery of Government waste diversion and bioenergy targets and promotes the creation of sustainable indigenous jobs.

Cré has a broad membership base ranging from compost and anaerobic digestion facilities to waste companies, local authorities, technology providers, local authorities, consultants and third level colleges. Cré is recognised by Government and agencies as the voice of the industry in Ireland and Northern Ireland. It is frequently called upon to give the industry view on future policy and legislation. Cré is a member of the European Compost Network, the European Biogas Association and the Biobased Industries Consortium. Cré has a Board of Directors, a Carbon Committee, a Technical Committee, a Public Relations Committee and an Anaerobic Digestion Committee. See www.cre.ie

In 2019, Cré CLG established a wholly owned subsidiary Cré Certification Ireland DAC to provide certification services for the Cré Compostable Certification Scheme.

Focus of the Cré Submission

Cré's submission is not responding to all the questions in the consultation, but is responding to last section, which are relevant to the local processing of organic waste and the use of the end products- compost and digestate.

2. Consultation Questions & Cré's Responses

Q6. If you wish to make comments on the draft 2030 Agri-Food strategy, please ensure to state clearly the section of the draft Strategy and page number (if relevant) that your comment or submission relates to.

Organic Farming, p91

Cré Comment: The composting and anaerobic digestion sector can help grow the organic sector in Ireland by providing compost and digestate. The authors¹ compared the Irish data with the heavy metal limits in the EU Organic Farming Regulation 884/2008.15 Generally, digestate and green waste compost can meet the limits for organic farming. This shows that operators in the market need to consider getting their compost and digestate certified for use in organic production.

Irish agriculture could also play an important role in decarbonising other sectors of the economy through the production of bioenergy and biogas. P93

7. Scale up renewable energy (RE) sources, especially anaerobic digestion, biorefining, and solar PV; focus on energy efficiency; and examine potential barriers to the roll-out of RE at farm level, including necessary support for microgeneration and access to the grid. P54

Cré Comment: In terms of bioenergy, the anaerobic digestion of liquid animal manures should be supported by Government policy. A centralised based anaerobic digestion plant would provide the scale to make it viable in which local farmers are supported in terms of getting their animal manures processed and then getting back a nutrient rich fertiliser which could be used to displace the buying of chemical fertilisers. For more solid manures from straw bedding of animals, farmers could be provided with a capital grant to purchase a PTO driver windrow turner in which farmers could compost their own solid manures into compost. This compost is stable and could be used to displace chemical fertilisers but also it would aide the carbon sequestration in soils. In addition to individual farmers getting support to purchase equipment, a group of farmers could be supported to purchase a PTO windrow turner that they could all share. The option of a existing agricultural contractor having their own windrow turner to which a complete service could be provided to farmers should also be considered.

There is a lack of research around the benefits of properly composted farmyard manure for soil health. Research should be undertaken to show this benefit by Teagasc. This is also relevant to organic farming as organic farmers are allowed to import conventional farmyard manure provided it is composted for three months. The benefits of turning or aerating compost is not widely understood or disseminated. Supports could be made available for farmers to navigate end of waste regulations. Low risk industrial wastewaters and recovered nutrients should be accessible for some applications.

To include tariff considerations on bioenergy imports, and incentives for co-operative farming structures and distribution.

The microgeneration scheme only allows a maximum of 30% of renewable electricity to be sold to the grid, 70% must be consumed onsite. This is unnecessarily restrictive and does not encourage energy efficiency.

In America for example the biogas sector is supported with the American Carbon Intensity-based Low Carbon Fuel Standard model.

Research was conducted under a FIRM research project by NUI Galway/Teagasc. This study demonstrated digestate emitted much less CH₄ and CO₂ when spread, compared to slurry. The technology to process manures and silage is proven. A financial support scheme needs to be put in place for anaerobic digestion plants that are off a viable scale. This would likely be community-based plants. To include a subsidy to compensate for yield diversity in biogas produced from manure - improve price competitiveness to alternatives.

One of the benefits of AD treating waste is the reduction of N₂O emissions.

Ireland has a golden opportunity to establish a new industry in rural Ireland that will create jobs and help meet our commitments for renewable energy and climate change, through the deployment of anaerobic digestion technology. This is a proven and environmentally friendly technology that can deliver multiple energy, climate,

¹ Foster & Prasad (2021) The development of quality standards for compost and digestate in Ireland. EPA

environmental, societal and economic benefits. There has been very little development of AD to date in Ireland. The major roadblock to expansion in Ireland has been an ongoing lack of economic viability for developers and investors. Improved fiscal incentives are required to enhance the attractiveness of AD in Ireland for investment

Incentivising the use of bioCNG and bioLNG for Heavy Goods Vehicles (HGV) and long-haul transport will provide a market for green gas and carbon trading (RTFO). Biomethane is best placed to replace transport fossil fuel in the short to medium term, prior to the roll out of new fuel cell technologies, expected after 2030.

There is an opportunity to capture CO₂ from the upgrading of Biogas into biomethane, thereby creating a market for green CO₂ which can be used to replace industrial and potentially food grade CO₂, as happens in Italy (Biogas done Right). There, CO₂ is recovered and used in the beverage market.

Carbon-farming offers a potentially new source of income for farmers but it is still in the early stages of development. The Ag-Climatise Roadmap proposes a pilot scheme for on-farm carbon trading to reward farmers for the public goods they are providing. This should align with the proposed EU Carbon Farming Initiative as set out in the Farm to Fork (F2F) Strategy, whereby a new regulatory framework for certifying carbon removals will underpin a payment to farmers- P18

Cré Comment: Overall, if farmers were paid for sequestering carbon in a regulated government run carbon credit scheme, this would encourage the use of cover crops, the processing of animal slurries in anaerobic digestion and the composting of manures.

Some regenerative agriculture practices have been reported to sequester carbon up to 1m deep, most soil analysis measure up to 200mm deep. The method of sampling soil organic carbon should be agreed. Farmers should be supported and encouraged to process their own liquid and solid manures by anaerobic digestion and composting. Regenerative agricultural practices should be supported and one of the best ways is farmers to manage soils with cover crops, changes in farming practices and the addition of compost/digestate. Farmers should be encouraged to trade carbon credits and this should be done on a farm by farm basis in which soil samples are taken to independently show increases in carbon sequestration in soil. An example of this is in Austria.

Austria: the 'Humus Projekt'

The 'Humus Projekt' refers to an Austrian private scheme for soil carbon credits. In this project, participating farmers can sell so called 'soil carbon credits' equivalent to the amount of carbon they have additionally stored in their soil during project participation. Companies wishing to reduce their carbon footprint buy the carbon credits. Started as a local initiative in 2007, the scheme now involves more than 100 farmers throughout the country. The Austrian retailer Hofer AG (part of Aldi) is the main buyer of credits.

When a farmer starts participating in the project, a baseline measurement is carried out of the stable organic matter (humus) in his soil. He then starts working on storing additional organic matter, e.g. by applying organic soil improvers, planting green cover, reduced tillage etc. An important role is for an initial high compost dosage of 100 -200 tonnes/ha: it is claimed that this high dose kickstarts/resets microbiological soil life and helps the further rapid build up of soil organic matter. After two to five years a second measurement of soil organic matter is carried out. The additional soil organic matter stored during the first 2-5 project years is calculated, and converted to a corresponding amount of CO₂. The farmer then receives a payment of carbon credits equivalent to 60% of this amount of CO₂. Five years later another (third) measurement of soil organic matter is undertaken. If the content is at least equal to the quantity during the second measurement, the farmer receives a second payment corresponding to the remaining 40% of the credit value.

The carbon credit price is € 45-/tonne, of which € 30,- is for the farmer and € 15,- for the scheme management. Costs for soil sampling and soil analyses, as well as coaching of farmers throughout the project is included in scheme management costs. The relatively high carbon credit price is acceptable to buyers because of the credible layout of the scheme, and the local context ('carbon in soils of local farmers instead of trees in Brazil').

Marin Carbon

In response to the rapid pace of global climate change, the Marin Carbon Project (MCP) seeks to enhance carbon sequestration in rangeland, agricultural, and forest soils through applied research, demonstration and implementation in Marin County.

From the original three demonstration farms, MCP has supported the creation of 12 full carbon farm plans covering 9,054 acres. Four more ranches were selected for plans in the fall of 2017, with the goal of completing and supporting 20 ranches in practice implementation by 2020. Over 20 years, the potential carbon reduction associated with these plans is 123,679 MTCO₂.

Australia

Dr Christina Jones said in March 2019 farmer Niels Olsen was the first farmer in the world to be paid for sequestering carbon in a regulated government run carbon credit scheme.

- Olsen was paid for sequestering 11.2t CO₂e/ha and he was paid 13.7t CO₂e/ha.
- The current rate of carbon credit in Australia is around €10/t, so sequestering 13.7Tcoe/ha generated an income of €137/ha.

Farmers need to be supported such as:

- Reward sustainable farming practices; organic and regenerative agriculture
- Adopt an organic fertiliser obligation
- Support for farmer co-ops for renewable energy generation community based anaerobic digestion plant and /or composting of food waste, straw bedding, green waste, producing quality local and clean biofertiliser, communities less likely to contaminate their own fertiliser stock.
- Access to specialist advice relevant to diversification and uptake of alternative farming enterprise. Educated specialist advice on alternatives, subsidised by government.
- Agricultural courses such as the TEAGASC Green Cert have a key role to play in education. The courses should include modules with input from relevant experts outside the traditional agricultural modules.
- The advisory services public and private sector advisors must upskill, be educated and trained on the purpose of the measures and the implementation practices in order to explain to farmers. Effective knowledge transfer is key.

page 54 “Conduct appropriate and relevant assessments of the impact of the more detailed Commission proposals for pesticide use reduction”

FiBL and other EU and international organisations are conducting interesting research into compost-derived bioactive compounds for plant protection. Irish research in this area should be supported.

Page 69- “Scale up resource-efficient, circular and low carbon solutions based on principles of renewable energy, cascading and circular use of sustainable biological resources”

End of waste regulations will play a big role in achieving this goal. Supports should be made available to facilitate the application of certificate of registrations where applicable and for meeting end of waste criteria. For End of waste sufficient study/qualitative assurance must be in place to allow, secondary raw materials to attain End of waste status.

The Strategic Environmental Assessment (SEA) acknowledges that *“that growing and developing new markets could result in increased demand which may see an unintended continuation of the recent growth in output of certain categories, most notably milk”*. Ireland is one of the largest producers of breastmilk substitutes in the world with continued growth and targeting of further overseas markets (<https://www.independent.ie/business/irish/dairygold-building-war-chest-for-new-acquisitionsto-boost-health-business-40284210.html>). There is clear evidence of intended increased dairy intensification and production in all aspects of the Agri-Food Strategy. Whilst it is welcome that Actions 3 and 14 include “producing a detailed plan to manage the sustainable environmental footprint of the dairy and beef subsectors”, this is not enough as production has already increased post ending of milk quotas and the scope is not wide enough. Intensive dairy production require markets to seel into, and the full environmental impacts of increased sales of dairy produce overseas should be considered. This includes the impacts to local food systems, the health of target markets (both infants and parents), packaging, and transport. With respect to *Table 6: High Level Matrix Assessment of Strategy* and the review of *Goal 7: Policy coherence and synergies in Sustainable Food Systems (SFSs) between Ireland’s domestic policy and its development cooperation and foreign policy*; Action 1 is awarded a positive review from a population and human health perspective. The lack of acknowledgment of Africa as an emergent market is concerning, however, some acknowledgment of this is made on page 94: “it may lead to increasing Ireland’s reputation in the international market”. It is imperative that in engaging in aid development overseas that inducing food insecurity in those populations does not become an outcome of such intervention. Promotion of breastmilk substitutes is detrimental to breastfeeding rates, where human milk is the most food secure system in existence. Promotion of unnecessary “growing-up milks” for young children has been identified by the WHO as concerning as it may lead to childhood obesity and other non-communicable conditions (<https://apps.who.int/iris/bitstream/handle/10665/260137/9789241513470-eng.pdf>). Again, the full consequences of the production, marketing, and sales have not fully been considered. Inducing food insecurity in other populations to promote sales is an environmentally damaging practice and is not acknowledged nor explored in this SEA.



Member - Baby Feeding Law Group Ireland



An Roinn Talmhaíochta,
Bia agus Mara
Department of Agriculture,
Food and the Marine

Public Consultation on the environmental assessment of the Draft Agri-Food Strategy to 2030

Fields marked with * are mandatory.

Introduction

Background

Ireland's agri-food sector has benefited from an approach to strategic policy planning whereby sector-led strategies are developed every 5 years. The Minister for Agriculture, Food and the Marine convened a Committee representative of the sector to develop an agri-food strategy to 2030, with their terms of reference being to outline the vision and key objectives, with associated actions, required to ensure the economic, environmental and social sustainability of the agri-food sector in the decade ahead. To ensure that environmental considerations are fully integrated into the preparation of the Strategy, a Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) has been conducted in parallel with the work of the Committee.

The Department has procured RSK Ireland Limited to carry out a Strategic Environmental Assessment of the likely significant effects on the environment of implementing the 2030 Agri-Food Strategy.

The environmental assessment has been carried out in accordance with EU Directive 2001/42/EC and the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (SI 435 of 2004), as amended.

In addition, the consultants have been asked to undertake an associated Appropriate Assessment (AA) Natura Impact Statement pursuant to Article 6 of Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora as transposed into Irish law by S.I. 477/2011 the European Communities (Birds and Natural Habitats) Regulations 2011.

Terms and Conditions

The Department of Agriculture, Food and the Marine is collecting this data to inform the Environmental Assessment process as part of the development of the Agri-Food Strategy to 2030. All submissions, including the name of the person or organisation making the submission, will be shared with our external consultants who are conducting the Strategic Environmental Assessment and Appropriate Assessment on our behalf. All submissions, including the name of the person or organisation making the submission, will

be published on the Department's website, however, if you wish to make a submission but not be identified publicly this can be accommodated provided it is clearly indicated when the submission is made.

Freedom of Information

All submissions and comments submitted to the Department for this purpose are subject to release under the Freedom of Information (FOI) Act 2014 and the European Communities (Access to Information on the Environment) Regulations 2007- 2014. Submissions are also subject to Data Protection legislation. Personal, confidential or commercially sensitive information should not be included in your submission and it will be presumed that all information contained in your submission is releasable under the Freedom of Information Act 2014.

Data Protection

The Department of Agriculture, Food and the Marine is collecting this data to inform the Environmental Assessment process as part of the development of Agri-Food Strategy to 2030. All submissions, including the name of the person or organisation making the submission, will be shared with our external consultants who are conducting the Strategic Environmental Assessment and Appropriate Assessment on our behalf. This data will be processed in accordance with the EU General Data Protection Regulation (GDPR EU 2016 /679), the Data Protection Acts 1988-2018, the Freedom of Information Act 2014 and the DPER Consultation Principles and Guidance. Any additional personal data received as part of your submission will not be processed, shared, or retained and will be destroyed upon receipt. Further information on Data Protection can be found on our website <https://www.gov.ie/en/organisation-information/ef9f6-data-protection>

The Department of Agriculture, Food and the Marine is committed to protecting and respecting your privacy and employs appropriate technical and organisational measures to protect your information from unauthorised access. The Department will not process your personal data for any purpose other than that for which they were collected. Personal data may be exchanged with other Government Departments, local authorities, agencies under the aegis of the Department, or other public bodies, in certain circumstances where this is provided for by law. The Department will only retain your personal data for as long as it is necessary for the purposes for which they were collected and subsequently processed. When the business need to retain this information has expired, it will be examined with a view to destroying the personal data as soon as possible, and in line with Department policy.

Your Details

* Forename:

* Surname

* Country

• How would you best describe yourself?

- Farmer
- Fisher
- Forest Owner/Manager
- Engaged in employment in the food and drink industry
- Engaged in employment in other business/industry
- Representative of a farm/seafood/forestry organisation
- Representative of a civil society/NGO
- Representative of an employer organisation or trade union
- Advisor/Consultant
- Researcher/Academic
- Representative or working in a Public Body
- Member of the Public
- Other (please specify in box below)

Please specify here

• Please indicate if you are submitting your proposal on behalf of;

- an organisation
- as an individual

Name of Organisation

• Please choose from options below to indicate whether you wish to have your name published on the Departments website alongside your submission

- My name can be published
- I do not wish to have my name published

Questions

Q1. Do you have any observations on the conclusions in the Environmental Report and Natura Impact Assessment?

5000 character(s) maximum

No comment, will defer to experts in area.

Q2. Having reviewed the Environmental Report, please provide comments on individual sections in more detail. Please ensure to state clearly the section of the Environmental Report and page number (if relevant) that your comment or submission relates to.

5000 character(s) maximum

No comment; will defer to experts in area.

Q3. Having reviewed the Natura Impact Assessment, please provide comments on individual sections in more detail. Please ensure to state clearly the section of the Natura Impact Assessment and page number (if relevant) that your comment or submission relates to.

5000 character(s) maximum

No comment; will defer to experts in the area.

Q4. Is there any additional information which in your view should be considered in the Environmental Report and/or the Natura Impact Assessment? Please specify.

5000 character(s) maximum

No comment; will defer to experts in the area.

**Q5. Are there additional mitigation/monitoring measures that you would like to propose?
Please specify.**

5000 character(s) maximum

Greater buffer zones be created between lands being sprayed by agriculture - for example potato growing- an incident last year currently under investigation by the NPWS whereby a contractor rented lands immediately bordering the River Nore SAC near Kilkenny city. Contractor planted to within 4 metres of river and in turn over the course of the season extracted huge volumes of water from the SAC river Nore to water crop- as I understand this- no AA was conducted, despite the need for one. Despite this, it took a member of the public to red flag this practice .This crop was also sprayed with the usual potato crop chemicals also- the run off undoubtedly ending up in river Nore, affecting the whole biodiversity of the SAC. Rivers in the south East currently register very high nitrate levels; drains leading to rivers and ditches need possible mitigating features- where possible, an assessment of filters being used as an interim measure to help reduce impact. Ideally, pay farmers to plant and sequester carbon near riverine environs.

Therefore, I submit that farmers and contractors be obliged to notify the NPWS when planting crops immediately beside riverine SAC's— a failure to do so, I submit is a serious breach of the Habitats Directive. NPWS should audit land use regularly and be funded to do so.

I also submit that Local Authorities be legally obliged to notify the NPWS when a planning application has been received which would involve development (farm buildings, slurry pits etc) close to a SAC/SPA.

Q6. If you wish to make comments on the draft 2030 Agri-Food strategy, please ensure to state clearly the section of the draft Strategy and page number (if relevant) that your comment or submission relates to.

5000 character(s) maximum

No comment.

Additional Supporting Information

If you have supporting documents, please upload here.

where possible, please limit supporting document to under 5000 words

Contact

2030StrategyEnvironmentalConsultation@agriculture.gov.ie



Indaver Ireland Response

Department of Agriculture, Food and the Marine

Draft Agri-Food Strategy to 2030

Introduction and Background

Indaver Ireland Limited ('Indaver') is pleased to take this opportunity to comment on the draft Agri-Food Strategy 2030 aimed at positioning Ireland to become a world leader in sustainable food systems over the next decade.

Indaver owns and operates a Waste to Energy (WtE) facility in Duleek, Co. Meath which is designed to safely and effectively treat residual municipal solid waste (rMSW). This form of sustainable waste technology has the added benefit of producing electricity and has greatly assisted in the diversion of waste from landfill in the State.

Indaver is also proposing to develop similar thermal recovery facilities in Cork and Belfast (arc21) and is actively assessing the potential development of infrastructure in Ireland for the treatment of biosolids¹ generated from waste water treatment.

From a policy perspective, such developments would assist with and support the envisaged transition to a circular, low carbon and climate resilient economy in line with the State's ambitious decarbonisation policy agenda.

Sustainable & Environmentally Sound Management of Bio solids

Presently, the practice of spreading bio solids/sewage sludge on agricultural land is the primary means of municipal sludge management in the State. This practice is not compatible with transitioning to a low-carbon, climate-resilient and environmentally sustainable economy and is prohibited in many EU Member States.

The draft Strategy aims to develop sustainable and circular value chains and business models for lower carbon intensity farming, including, organic production, protection and enhancement of biodiversity and water quality, and the production of bio-based products and bioenergy through

¹ Treated sewage sludge, commonly referred to as "biosolids", is the organic by-product of urban wastewater treatment. If appropriate treatment is applied, it may be reused as an agricultural fertiliser.

the Common Agricultural Policy (CAP) and implementation of the National Policy Statement on the Bioeconomy.

Whilst this Strategy will need to be consistent with the ambition set out for agriculture in the Programme for Government and the Climate Action Plan 2021, clear alignment with environmental protection and biodiversity policies is also needed if the practice of land spreading is to be addressed in a meaningful manner and policy co-ordination and coherence brought about.

As such, it is disappointing that this practice is not addressed in the Strategy as the same poses significant implications for the successful development of a truly sustainable and environmentally sound food system in Ireland.

Indeed, there is now an urgent need for investment in water infrastructure in the State. This is key to achieving compliance with the requirements of the Water Framework Directive (WFD) and a suite of associated Regulations and further EU fines averted.

In addition, An Bord Bia quality assurance programmes (Origin Green etc.) prohibit the use of raw or treated sewage/biosolids on Bord Bia certified farms as this has serious implications for the future development of the agri-food sector in Ireland and for the protection of human health and well-being. In this regard, the finalised Agri Food Strategy 2030 must take such significant environmental and health concerns into account.

In this regard, the Environmental Protection Agency (EPA) has found that there are many risks associated with the spreading of bio solids on agricultural land including the presence of emerging contaminants and metals in sewage sludge and the potential for surface runoff of harmful contaminants into receiving waters.

Such risks are clearly underlined in the EPA's, 'Ireland's Environment 2020' report where it states that:

'One area in which Ireland risks not achieving a zero pollution and non-toxic environment is land-spreading of sewage sludge from wastewater treatment plants. Irish Water estimates that the quantities of sewage sludge generated nationally (currently 58,630 tonnes dry solids) will increase by more than 80 per cent by 2040 as new wastewater treatment plants are established and existing ones upgraded'.

There is also increasing concern that such practices may contribute to the presence of antimicrobial resistance genes (ARG's) in soil which may potentially enter the food chain via contaminated crops or groundwater and may therefore impact human health².

² Carlos Chique, John Cullinan, Brigid Hooban and Dearbhaile Morris, Mapping and Analysing Potential Sources and Transmission Routes of Antimicrobial Resistant Organisms in the Environment using Geographic Information Systems—An Exploratory Study (2019)

The EPA has also estimated that over a billion micro plastic particles are spread on agricultural land in Ireland each year and acknowledge that '*this is probably an underestimation*'.³ Whilst the impacts of such particles on human health are not yet known as acknowledged by the World Health Organisation (WHO), the presence of such particles through land spreading may clearly be regarded as unacceptable on environmental and health protection grounds.

Thus, the foregoing has serious implications for the future development of the agri-food sector in Ireland and for the protection of human health and well-being. Moreover, from a European policy perspective, there are a number of recent policy developments which underlie a move towards more stringent standards and / or a prohibition on land spreading in the EU.

For example, the recently adopted EU Action Plan: 'Towards Zero Pollution for Air Water and Soil Zero'⁴ underlines that the upcoming review of the Urban Waste Water Treatment Directive will, in synergy with the evaluation of the Sewage Sludge Directive, will help to increase the ambition level to remove nutrients from wastewater and make treated water and sludge ready for reuse, supporting more circular, less polluting farming.

The evaluation of the Sewage Sludge Directive to date expressly references waste incineration and aims to assess its suitability for sewage sludge treatment.⁵ In this regard, the thermal treatment of sludge incorporates the recovery of phosphorous from the ash and therefore the nutrient value of the material is maintained.

Such reviews will also address emerging pollutants such as microplastics and micropollutants, including pharmaceuticals. Against this backdrop, there now exists a clear need for investment in alternative sludge treatment infrastructure in the State given the increasing likelihood of more stringent policy measures at EU level. In this regard, the statutory National Planning Framework (NPF) provides that planning for waste treatment requirements to 2040, will require additional sewage sludge treatment capacity and a standardised approach to managing waste water sludge and including options for the extraction of energy and other resources.

Conclusion

Given that the quantity of wastewater sludge is expected to increase significantly by 2040 as detailed in the National Wastewater Sludge Management Plan (NSWSMP) (and due to be reviewed imminently) and the current pressures on the agricultural outlet for wastewater sludge make the timely consideration of alternative outlets a matter of urgent concern.

Thus, in line with the aforementioned serious environmental and health concerns, the new Agri-Food Strategy must necessarily consider the need for investment in alternative sludge treatment infrastructure given the increasing likelihood of more stringent policy measures at EU level as a

³ EPA Report, Scope, Fate, Risks and Impacts of Micro plastic Pollution in Irish Fresh Water Systems (2014), Available at: https://www.epa.ie/pubs/reports/research/water/RR%20210Essentra_web.pdf

⁴ European Commission Communication, EU Action Plan : 'Towards a Zero Pollution for Air, Water and Soil : [EUR-Lex - 52021DC0400 - EN - EUR-Lex \(europa.eu\)](#)

⁵ European Commission Sewage Sludge Use in Farming Evaluation [Sewage sludge use in farming – evaluation \(europa.eu\)](#)

constituent part of essential water infrastructure. This is also crucial to the further expansion and sustainable development of the agri-food sector in the State.

Both public and private sector investment will undoubtedly be required to deliver such critical infrastructure and to achieve a much improved level of environmental protection in line with circular economy principles.

An identified mechanism that is designed to adequately and sustainably deal with this voluminous waste stream which can add value through energy recovery if treated by means of environmentally viable treatment facilities must now be given serious consideration.

In addition, clear and coordinated policy alignment and coherence across the overarching agricultural, waste and resource efficiency, environmental protection and biodiversity policy framework is needed.



Iascach Intíre Éireann
Inland Fisheries Ireland

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RE: Draft Agri-Food Strategy to 2030 and associated Environmental Analysis consultation

14th June, 2020

Dear ██████████

Thank you for the opportunity to contribute to the Departmental response on the Draft Agri-Food Strategy to 2030 and associated Environmental Analysis consultation. These comments reflect the views of IFI in respect of the above mentioned strategy.

About Inland Fisheries Ireland's Role

Inland Fisheries Ireland is the statutory authority tasked under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) with responsibility for the protection, management, and conservation, of the inland fisheries resource and recreational sea angling. IFI is mandated to ensure that the fisheries of the State are protected. To protect means to keep safe, defend, to shield from danger, injury or change. "Fisheries" includes all inland fisheries recreational and commercial, sea angling and mollusc fisheries stipulated under the Fisheries Acts, the physical habitat upon which the fishery relies, the facilities and access, the quantity and quality of the water and the plant and animal life on which fish depend for shelter and food and the spawning areas where in fish deposit their eggs. The protective role of IFI relates to all aspects of the aquatic environment and all factors that influence the biotic communities within waters, which in any way relate to the propagation of fish populations. Ireland has in excess of 70,000 km of rivers and streams and 144,000 ha of lakes, all of which fall under IFI's fisheries management jurisdiction. Many of these watercourses discharge directly to the sea and support species which utilise the marine environment for parts of their life cycle (e.g. salmon, sea trout, eel, lamprey species).

Aquatic Biological Diversity

Under section 7(3) of the IFI Act it is stated that IFI shall in the performance of its functions have regard to (g) the requirements of the European Communities (Natural Habitats) Regulations



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Inland Fisheries Ireland

1997 (S.I. No. 94 of 1997) and the need for the sustainable development of the inland fisheries resource (including the conservation of fish and other species of fauna and flora habitats and the biodiversity of inland water ecosystems),

(h) as far as possible, ensure that its activities are carried out so as to protect the national heritage (within the meaning of the Heritage Act 1995).

The Irish implementing legislation for the Habitats Directive identifies the Minister for Communications, Climate Action and Environment as having a role in carrying out monitoring of the status of the relevant fish species. The present IFI R&D programme fills this Ministerial obligation and complements it by including those fish species listed in the current Red Data Book and not covered by the Habitats Directive including the conservation of diadromous species including salmon, shad, smelt, and lamprey. IFI also has responsibility for pollan and the recreational angling aspect of marine fish species. Pollan for example are a rare endangered and protected species listed and protected under Annex 5 of the Habitats Directive. The Irish Pollan (*Coregonus Pollan*) is unique to the Island of Ireland with its current known distribution being limited to five lakes, Lough Allen, Lough Ree and Lough Derg and Lough Neagh and Lower Lough Erne. The Arctic char (*Salvelinus alpinus*) is another example of a highly sensitive fish species endemic to Irish upland waters and which is protected under national legislation. Furthermore the European Eel is now endangered and additional protection measures have also been introduced in that regard - it is incumbent on Ireland to ensure that the eel and its range and habitat are properly protected. Please also note that there are many surface waters, which are not formally designated but which support stocks of Annex II species designated under the habitats Directive.

The National Fisheries Resource – sustainable exploitation and the economy

IFI is the responsible agency in respect of the licensing and management of commercial and recreational fishing for salmon, with protection responsibilities at sea out to 12 miles from baselines. IFI is also mandated to market and promote Irish recreational angling in both the domestic and foreign tourism markets. This brief acknowledges the importance of angling as a contributor to the Irish economy both in terms of revenue generated and the jobs it sustains.

It is important to highlight that (freshwater and marine recreational angling) directly supports over 11,000 existing Irish jobs, many of which are located in the most peripheral and rural parts of the Irish countryside and along our coastline (IFI, 2015). Within the sector participation rates totalled 446,000 people who were involved in recreational angling in Ireland in 2015, with over 170,000 of these travelling from Northern Ireland and overseas. Over a quarter of a million Irish adults (273,000) held a fishing rod in that period, with sea angling along with salmon and brown trout angling, observed as the most popular categories where domestic anglers are concerned. The quality of the Irish angling product, the friendliness and hospitality of the Irish people and the country's outstanding scenery were cited amongst the principal attractions of Ireland as an international destination for recreational angling.



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As one of Ireland's core environmental agencies, Inland Fisheries Ireland is committed to contributing wherever possible to achievement of the UN's 17 Sustainable Development Goals (SDGs) and strongly supports the assertion that the SDGs are for everyone in society and that each of us can make a contribution, large or small, to their success. Achieving a Climate Smart, Environmentally Sustainable Agri-Food Sector as envisaged should assist Ireland's positive contribution to global progress on the SDGs.

The EU Water Framework Directive

The EU Water Framework Directive (2000/60/EC) is recognised as a critical regulatory legislative provision. The WFD entered into force in December 2000 and requires the protection of the ecological status of surface and ground waters – this encompasses (among other elements) water quality and requires the conservation of habitats for ecological communities.

One of the primary objectives of the Directive is to establish a framework which prevents further deterioration and protects and enhances the status of aquatic ecosystems. Protection of aquatic ecosystems requires that surface water systems be protected on a catchment basis - a shared objective between all relevant public authorities. Article 5 of the 2009 Surface Water Regulations requires that a public authority, in performance of its functions, shall not undertake those functions in a manner that knowingly causes or allows deterioration in the chemical or ecological status of a body of surface water. Article 28(2) of the said regulations states that a surface water body whose status is determined to be less than good shall be restored to at least good status not later than the end of 2015.

WFD monitoring has identified agricultural diffuse and point source pollution as the most significant risk to surface waters and a significant pressure in 780 (53%) of the 1,460 water bodies identified as At Risk of not meeting their environmental objective. Water quality indicators include the presence of high phosphate, nitrate or ammonium concentrations related to agricultural practices; key risks include the presence of surface-flow pathways for nutrients, chemicals (fertilizers, pesticides, herbicides etc.) and sediment to surface waters, land drainage with associated siltation, instream habitat impacted by riparian zone management and agricultural abstraction pressures.

Agri-food Strategy to 2030

IFI notes the ambition to deliver a sustainable food strategy where economic, environmental, and social sustainability of the agri-food sector are assured in the decade ahead. IFI notes the ambitions as contained in:

- the Ag-Climate strategy as per Goal 1 including the ambitions to *Reduce nutrient loss and contribute to improved water quality and biodiversity*, as well as *Build sustainable, resilient food production and land use management systems that meet these climate and environmental obligations, while also meeting market expectations*.
- the Restore and Enhance Biodiversity as per Mission 1 Goal 2.
- The Protect high status sites and contribute to achieving good water quality and healthy aquatic ecosystems, as set out in the Water Framework Directive as per Goal 3.
- Develop Diverse, Multi-Functional Forests as per Goal 4.



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- Enhance the Environmental Sustainability of the Seafood Sector as per Goal 5.
- Strengthen and invest in Origin Green and other sustainability supports to reflect the higher level of ambition for the agri-food sector as per Goal 7.

IFI welcomes your monitoring proposals as contained in Section 8 of the Environmental Report and notes the following:

- the High-Level Implementation Committee (HLIC), as the Managing Authority, to monitor significant environmental effects of implementing the Strategy.
- An Environmental Working Sub-Group should be established to oversee monitoring, review and reporting of environmental issues and report back to the HLIC.
- Goal 3: Protect high status sites and contribute to achieving good water quality and healthy aquatic ecosystems, as set out in the Water Framework Directive
 - Monitor nitrogen fertiliser usage rates over the Strategy period to establish if rates fall (as Action 1), regional / catchment area reporting should be adopted where possible to match the recorded achievements to the areas of greatest urgency (as identified by the baseline).
 - Increase the overall amount of water bodies monitored.
 - Monitor nitrogen and phosphorus levels of waterbodies, especially those already known to be affected by agriculture.
 - Annual reporting around on farm chemical fertiliser use in relation to herd numbers.
 - Annual reporting on Agri-Environment scheme take-up through the new RDP with specific reporting of uptake by more intensive farms where uptake has previously been lowest (Action 4).
 - Publication of National Soils Strategy (as Action 5).

Scope of the SEA

IFI endorses the selection of sustainability topics as outlined in the main document (*Draft Agri-food Strategy - Executive Summary – Narrative - Sustainability – Economic, Environmental, Social – (ii) Environmental Sustainability – page 19*).

We also note the following have been considered in the Environmental Report.

- Biological diversity
- Climate Disruption
- Water quality
- Surface water hydrology
- Fish spawning and nursery areas
- Passage of migratory fish / biological connectivity
- Areas of natural heritage importance including geological heritage sites
- Ecosystem structure and functioning
- Sport and commercial fishing and angling
- Amenity and recreational areas
- Sediment transport
- Alien invasive species



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Sustainable Aquaculture

Inland Fisheries Ireland are supportive of sustainable aquaculture in Ireland. A large body of scientific publications have demonstrated that the current popular model of open net pen aquaculture has not been sustainable and has caused considerable negative impacts to wild salmonid populations. Ireland also has obligations under the NASCO Convention including its goals on sea lice management and containment, and under the EU Habitats Directive to safeguard wild salmon stocks from the impacts of marine salmon farming. Therefore, it is the view of IFI that when the environmental issues are set out, it will be evident that for salmon aquaculture to be sustainable over the 2021-2030 period and beyond, a clear change in approach will be required to more sustainable production systems that minimise and eliminate actual and potential negative impacts to our wild salmonids.

Concluding Remarks

The long-term environmental sustainability of any activity that may impact on the status of fish species, their habitats, fisheries and/or the recreational angling or related commercial activities that may utilise these resources is of primary concern to IFI. IFI is among the public bodies that have a role in making policies, plans or programmes relevant to surface waters in Ireland. Critical and sensitive habitats and species (both designated and otherwise) must be protected. A number of fish species and associated habitats are protected under European Directives in Ireland. From an IFI perspective, all fish species and associated habitats within its remit require protection and management for conservation and development. IFI advocates application of the precautionary principle when considering the fisheries resource in the current process. In addition, all available consideration and support should be afforded to the national 'Blue Dots Catchment Programme' which focuses on the protection or restoration of high ecological status water bodies – a vital component in fisheries ecology, freshwater ecosystems and in Ireland's aquatic biological diversity more generally.

IFI are grateful for the opportunity to have these views considered and incorporated as a component of the Draft Agri-Food Strategy to 2030 and associated Environmental Analysis consultation.

Should you require clarification on any of the above or require a consultation meeting please contact Inland Fisheries Ireland.

Inland Fisheries Ireland
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Draft Agri-Food Strategy to 2030 Environmental Consultation
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Portlaoise
Co Laois
R32 K857

15th June 2021

Re: Public Consultation on the Environmental Assessment of the Draft Agri-Food Strategy to 2030

To whom it may concern,

I am pleased to have actively participated as a member of the Agri Food 2030 Strategy Stakeholder Committee on behalf of the Irish Co-operative Organisation Society (ICOS).

The draft strategy is a document that ICOS can broadly support.

It is clear that the implementation of the strategy, if achieved in full, will have positive implications for Ireland's environment, as concluded by the RSK Environmental Report and the Appropriate Assessment.

ICOS fully endorses the objective for Ireland to become a world leader in Sustainable Food Systems (SFS) over the next decade.

Carbon Neutral Food System

The draft strategy envisages a carbon neutral food system by 2050, with verifiable progress achieved by 2030. It is welcome that this approach will encompass carbon sequestration, as well as emissions, air, biodiversity and water quality. We also agree that carbon farming will become an important income source for farmers over the coming decade. It is important to provide a regulatory framework at EU and national level, including the verification of carbon stored through land use within national inventories. It is equally important to develop the business models and income streams to enable farmers to benefit from their efforts to store and sequester carbon.

National Herd & Biogenic Methane Target

There is a growing public debate surrounding the national herd, its size and its contribution to climate change and other environmental indicators. The concept of a stable national herd is included as part of the draft Ag Climatise Roadmap.

The target to reduce biogenic methane by a minimum of 10% by 2030 is included in the draft strategy and is a target ICOS would question. We believe that this would restrict moderate levels of increased output in the dairy herd, which remains the legitimate aspiration of the dairy industry.

It is established that total cattle numbers have increased from 6.42 million in 2015 to 6.52 million in 2020 (+1.6%). Although, since 2018, total cattle numbers have decreased by -0.9%.

The total number of dairy cows have increased from 1.24 million in 2015 to 1.45 million in 2020 (+17.4%). The total number of beef cows decreased from 1.05 million in 2015 to 922k in 2020 (-12.4%). Total GHG's over this period from agriculture has increased by +5.9%. GHG's from agriculture decreased in 2019 vs 2018 (-3.9%). Milk production (+41.4%) and Milk Solids (+47.1%) have increased over the same period.

We believe the concept of a stable national herd requires more debate between policy makers, industry and farmers to ensure a collaborative transition to a carbon neutral food system. We further believe that the approach must be based on the national herd and not individual farm systems that comprise the total number of cattle farmed in Ireland.

It must be pointed out that the dairy sector is the most profitable sector in agriculture. However, this is as much to do with the low incomes evident in other farming sectors, where farm incomes continue to remain at unacceptably low levels.

No business sector, however successful, can sustain static or constrained revenues along with increased costs of production. Irish dairy farming is no different.

Policy makers need to be able to facilitate pathways for new entrants into dairy farming, to support a vibrant and sustainable sector. This is why proper consultation around the concept of a stable national herd is required.

International Trade

ICOS does not agree that the objective to promote and grow international trade will have potential negative environmental implications. This argument is deeply flawed.

Dairy sector output is valued at €11.3 billion and exports valued at €5.2 billion in 2020. Ireland exports 92% of its dairy output to over 120 countries worldwide with every €1 of exports of dairy goods represents a 90 cent spend within the Irish economy. In stark contrast, every €1 exported by multinational companies represent 10 cent spend within the Irish economy.

The key competitive advantage of Ireland's agri-food sector is its prominent grass-based production system and the low carbon footprint of the Irish dairy sector.

Our unique system is based on the sustainable conversion of grazed pasture into high value dairy products, which attract a premium on world markets due to providence, and sustainability of the production chain.

The reality is that policies that will result in restricted milk production from Ireland will ultimately increase global emissions and harm the environment; the introduction of policies that facilitate this to happen will increase climate change.

Following a review of the Environmental Report and Appropriate Assessment, ICOS in summary would like to make the following points:

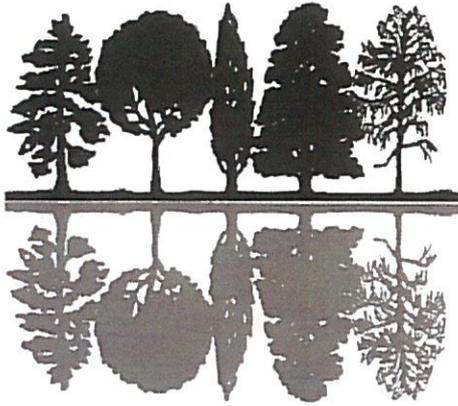
- ICOS believes that a very thorough review of the environmental impacts of the Agri Food Strategy (AFS) 2030 has been carried out.

- The assessment concludes that the draft AFS will not have any significant adverse effects upon the integrity of any Natura 2000 site, subject to mitigation measures being implemented.
- The environmental report concludes, in general, that positive sustainable measures were included with respect to agricultural intensification, diffuse and atmospheric pollution and fisheries.
- The high-level targets outlined in the strategy represent very demanding targets for the Irish agri food 2030 strategy. We have concerns in relation to the impact of the 10% reduction in biogenic methane and how this will be achieved.
- Overall, the balanced approach as identified under alternative 3 appears to strike the right approach bearing in mind the three pillars of sustainability – economic, social and environmental.
- That said, we would have severe reservations with an approach that would restrict or limit moderate levels of output increases from the dairy herd, so long as it is managed in a sustainable manner.

I look forward to further engagement and to the next meeting of the Agri Food Strategy Stakeholder Committee.

Yours sincerely,



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Irish Timber Growers Association submission to the Agri-Food Strategy to 2030

14th June 2021

The Irish Timber Growers Association (ITGA) was established in 1977 and is the national representative body of private woodland owners in Ireland. The membership of the Association mirrors the wide range of different timber growers in the country and current membership includes farm forest owners, forestry co-operative members, private woodland estates, forestry investors and forestry pension funds. This wide range of membership allows the Association to take a broad view of the industry and issues facing the sector.

The Irish Timber Growers Association welcomes the opportunity to make this submission to the Department of Agriculture, Food and the Marine Agri-Food Strategy to 2030.

The Association will focus its submission specifically on the forestry and timber sector and the contribution forestry, encompassing all tree planting, including agro-forestry, can make to the Agri-Food Strategy. This submission mainly focuses on GOALS 1-4 of MISSION 1.

➤ **Agri-Food Strategy to 2030 should set afforestation targets:**

ITGA welcomes that the Agri-Food Strategy to 2030 mentions *'the significant role forestry has to play'* throughout the proposed strategy. However, it has failed to set targets for afforestation in the 'High-level targets for 2030' (p9) and only mentions *'increasing afforestation'*.

GOAL 1 (MISSION 1) – Action 1 calls for the immediate implementation of the Ag-Climatise Roadmap. ITGA welcomes this, where this also includes the immediate implementation of Ag-Climatise Action 14:

'Action 14: Increase afforestation levels and maximise the contribution of existing forests to climate change mitigation and adaptation

- *Increase afforestation levels to 8,000 ha per year.'*

Where the Agri-Food Strategy to 2030 calls for the immediate implementation of the Ag-Climatise Roadmap, it should endorse this afforestation target of 8,000 ha per year and include this in the High-level targets for 2030 (P9).

Despite the fact that past Agri-Food strategies acknowledged that *'the role of Irish forests is key to the country meeting its international climate change targets'* and that

'This means that the decline in planting levels in recent years will need to be reversed.' (Food Harvest 2020) and included the aim *'Maximise uptake of allocated funding for the Forestry 2014-2020 Programme to help increase afforestation levels to capture carbon, and sustain the production of forest-based biomass to meet renewable energy targets.'* (Foodwise 2025), there has been no improvement in planting levels since these reports were published and the Agri-Food Strategy to 2030 has again missed an opportunity in failing to set afforestation targets and not integrating forestry with the agricultural sector.

While there are numerous references in the Strategy to Ag-Climatise, which does set a target for afforestation of 8,000 ha per annum in *'Action 14'*, there are no references to this section of Ag-Climatise in GOAL 4 (MISSION 1).

The current low planting levels will have significant repercussions for Ireland's ability to meet its international climate change targets in addition to its negative effect on renewable energy targets. Also, the decline in planting will have serious repercussions on the country's future supply of timber for processing, ultimately affecting exports, employment and the rural economy, as well as its carbon sequestration abilities. The shortfall in achieving our planting targets now will have more significant knock on effects for our industry and for Ireland in future years. As an export dependent country, the Irish sawmill and panelboard sector have achieved remarkable success in recent years and are exporting most of their finished products. Over 70% of sawn and over 80% of panelboard products which were produced in Ireland are exported. To date, the main limiting factor to increasing our exports of finished timber and panelboards was the supply of raw material (roundwood), which can only be addressed by increasing afforestation

➤ **Agri-Food Strategy to 2030 should emphasise the role of forestry in carbon sequestration:**

The role of forestry in relation to carbon off sets or carbon sequestration in GOAL 1 (MISSION 1) Actions 4b and 4d (p52) could be further emphasised. Action 4d calls for *'The introduction of an independent, robust, trustworthy certification mechanism that provides high quality monitoring, reporting and verification'*.

In January 2021, ITGA called for carbon payments for landowners who plant trees through the establishment of a verifiable Forest Carbon Code. Such a Carbon Code in line with the now well-established UK Woodland Carbon Code should be prioritised.

The Agri-Food Strategy to 2030 acknowledges the role of forestry in carbon sequestration, yet it only acknowledges its potential as *'make a very significant contribution to improving the Irish environment, particularly through carbon sequestration and storage.'* (p85).

There are numerous references to the Farm to Fork (F2F) strategy, but no references to the role forestry could play in the "new green business model" referenced in the EU Farm to Fork strategy.

➤ **Prejudicial language in relation to forestry in the Agri-Food Strategy to 2030 should be removed and the focus on positive contributions of forestry emphasised:**

The manner in which forests are referenced in Action 7 of GOAL 2 (MISSION 1), (P57): Restore and Enhance Biodiversity, of the Agri-Food Strategy is highly prejudicial:

7. Ensure that farms and forests do not contribute to habitat destruction and isolation, and also protect features of cultural heritage and traditional landscapes. This should include better enforcement of existing environmental rules, including strengthened implementation of the Environmental Impact Assessment (EIA) Agricultural Regulations in order to avoid habitat removal and loss of carbon pools.

ITGA objects strongly to the inclusion of the above in the Ag-Food Strategy and feels that Action 9 of GOAL 2 implies the same without the negative connotations:

9. Build on the measures introduced to protect and foster greater biodiversity in forests such as minimum broadleaf composition, setbacks from watercourses and archaeological features, Areas of Biodiversity Enhancement and the Woodland Environmental Fund, whilst recognising the need to maintain their economic viability as forests with rich biodiversity offer significant public goods and societal benefits.

The call for implementation of the Mackinnon report in Action 1 under GOAL 4 (MISSION 1) (P62) is welcomed, but ITGA would strongly urge the removal of the words ‘*and reducing deforestation.*’ This is legislated for in the Forestry Act, 2014 and adding this as an Action in the Agri-Food Strategy is superfluous.

Also, in its current draft, Action 5 of GOAL 4 (MISSION 1) (P63) shows the same prejudice as it appears to imply that ‘non-compliance’ by the forestry sector with environmental requirements and water objectives is the root cause of the licensing problem, which is a misrepresentation. Without any references elsewhere in the Agri-Food Strategy to Ireland's River Basin Management Plan 2018-2021, the Blue Dot Catchments Programme and the LIFE-IP Waters of Life Programme, it gives the impression that only the forestry sector has to comply with and/or participate in these programmes.

Action 5. Implement Project Woodland, to ensure that the licensing system for tree felling, thinning, roads and afforestation provides a predictable and efficient service for applicants, while complying with environmental requirements and those measures listed in the Forests & Water Achieving Objectives under Ireland's River Basin Management Plan 2018-2021. Active participation should also continue in the Blue Dot Catchments Programme and the LIFE-IP Waters of Life Programme.

This lack of understanding or appreciation of forestry's wide range of environmental and social contributions is also evident from the SEA Non-Technical Summary. The SEA highlights that [an unspecified] ‘*Number of farmers and other primary producers participating in schemes conservation schemes*’, yet does not mention the fact that over half of the Irish Forest estate is annually submitted for auditing carried out by an accredited certification body against one or both of two agreed international forest management certification standards, ensuring that these forests are sustainably

managed in accordance with national and international legal, social and environmental requirements. Instead, it only highlights forestry in terms of pressures on water quality from forestry activities, pressures on cultural heritage from extensive afforestation and limited gender diversity. Forestry is completely ignored in the SEA as an area of strength when it comes to human health and mental wellbeing, as an area of strength in terms of flood mitigation, or as an area of strength when it comes to improving air quality, climate mitigation, carbon sequestration, soil improvement etc.

In addition to economic and climate change mitigation benefits, forestry also provides a valuable source of renewable energy and other public goods and services, such as biodiversity, and recreation.

➤ **Forestry should be integrated into agriculture and included in the Department's title:**

Action 3 of GOAL 4 (MISSION 1) (p 62) advocates to '*Place farmers at the centre of a new and improved afforestation scheme*', this cannot be done in isolation, but requires integration of forestry in the agricultural sector. Action 3 also states '*A revised afforestation scheme could include: farmers undertaking the strategic planting of trees to create filtration buffers for example which can reduce sedimentation of adjacent water courses and intercept nutrient runoff from dairy and cattle farms to protect water quality; new native woodlands can provide habitat corridors for wildlife while at the same time providing a source of domestic fuel wood; small forest areas, shelterbelts, riparian planting and continuous cover forestry.*' ITGA welcomes this wording and has advocated this inclusion and integration of forestry in the farm enterprise for many years. However, by adding forestry as a separate GOAL, rather than integrating this into GOALS 1-3 of MISSION 1, the Agri-Food Strategy is failing to take the opportunity to better integrate forestry into farming.

It is important that forestry is properly integrated into farming and that the forestry sector is recognised in the Department's title and in the titles of its framework documents. The title of the agricultural sector's strategic plan Agri-Food Strategy to 2030 does not reflect the importance of the forestry sector within the Department or its potential contribution to the rural economy, sustainable agriculture or its central role in Ireland's Climate Action Plan and Biodiversity Action Plan. The forestry sector affects considerably more livelihoods than the equally important Marine sector, with the forestry sector consisting of 23,000 forest owners and employing another 12,000 people¹. Aside from its substantial contribution to climate change, renewable energy, recreation and biodiversity, the forest industry, comprising growing, harvesting and processing of forest products, makes a significant and growing contribution to the Irish economy and the output is valued at €2.3 bn per annum. If the Department intend the farming community to positively consider forestry as a significant land use option, forestry should be included in the Departments title. It should also be reflected in the title of this Agri-Food Strategy to 2030, possibly with the amended title, 'Agri-Food & Forestry Strategy to 2030'.

The Agri-Food Strategy to 2030 touches on the pressures on agriculture from the wide range of increasing societal demands. Integration of all sectors under the DAFM umbrella and working together towards a common goal is key to ensuring these demands for quality sustainably produced food and timber, biodiversity, carbon sequestration, air and water quality, nature conservation, health & wellbeing and recreation are met and secured for future generations to come.

¹ DAFM Forest Statistics – Ireland 2020

➤ **Need for Policy Coherence should include integration with Forest Policy.**

The Agri-Food Strategy to 2030 highlights the need for Policy Coherence ‘*There is a need for policy coherence between food, climate and environment*’ (p14), yet there is no evidence of such coherence when it comes to forest policy, which is only mentioned in the context of ‘GOAL 4: Develop Diverse, Multi-functional Forests’, aims to ‘*place farmers at the centre of a new and improved afforestation scheme*’. This can only be achieved through Policy Coherence. Forest policy consists of more than just afforestation and requires a vision beyond the planting stage.

The Agri-Food Strategy recognises ‘*The interconnectedness of policies for food, health, climate and the environment*’ (p14). A new Forestry Strategy for Ireland is currently being developed as part of Project Woodland and this Forestry Strategy should form an integral and central part of the Agri-Food Strategy to 2030. This new Forestry Strategy currently being drafted should be referenced in the Agri-Food Strategy 2030 as the recognised and adopted Strategy for the forestry sector.

The Agri-Food Strategy contains several references to the Nation’s health in the context of Covid-19. The positive role of woodlands in relation to human health and mental wellbeing is widely accepted in many cultures and has never been more important than during the Covid-19 pandemic. Also, the importance and benefits of trees for animal welfare for shelter and shade is widely acknowledged in many countries and could be encouraged in line with the ‘One Health One Welfare’, approach, endorsed by the Strategy.

➤ **The potential for forestry as an additional income stream for farmers should be emphasised**

GOAL 3 MISSION 2: Increase Primary Producer Diversification & Resilience (p93), acknowledges that ‘*The significant supports available to support afforestation can provide sustainable income streams*’ in a single paragraph with a referral to the Actions in GOAL 4 (MISSION 1).

Ireland currently has one of the widest differentials in the EU between farmers’ incomes and gross wages/salaries in the wider economy (as highlighted in the “Challenges and Objectives of the CAP-post 2020” presentation made by the EU Commission on the future of CAP at the CAP Consultative Conference dated 4th July 2018). Forestry income will be critical in bridging the gap between Irish farmers’ incomes and incomes in the wider economy. Forestry income is direct market income and is a source of long-term sustainable revenue for farmers and landowners. Such direct market income from forestry will also ensure a better balance between the operating subsidies and market income per farm and will help ensure the longer-term economic sustainability of the wider agriculture sector through reduced reliance on subsidies and through the generation of a more diverse income source.

The Irish Timber Growers Association (ITGA) through its work and various information and representation initiatives is committed to supporting the sector and its critical role in the sustainable economic, environmental and social development of rural Ireland. ITGA is actively supporting and promoting forestry's contribution to the State and recognises the significant importance of developing and implementing a comprehensive and robust National Forestry Strategy that underpins our national Climate Change and Biodiversity aims.



**SUBMISSION: PUBLIC CONSULTATION ON
THE DRAFT AGRI-FOOD STRATEGY TO
2030**

INTRODUCTION

Oxfam Ireland welcomes this consultation process. Oxfam works in contexts where agriculture and food are the main source of employment and income, is small scale and rainfed and accounts for most of the food consumed within households and in their wider local communities. As we live in globalised world, Ireland's policy approaches, especially in the agricultural sphere, are intertwined with these communities' efforts to secure sustainable development, build their food security and strengthen their resilience to climate and other shocks.

The Irish Government has set out the commendable ambition to become a global leader in sustainable food systems over the next decade in the draft Agri-Food Strategy 2030- an ambition that Oxfam Ireland welcomes. This focus on food systems thinking in the draft Agri-Food Strategy presents an opportunity to holistically address diverse but interconnected social, economic and environmental challenges. Underpinned by rights-based approaches, such an approach can help foster social equity, women's empowerment, economic productivity and prosperity, environmental regeneration and resilience building at all levels.

The following recommendations in this submission are taken from a forthcoming joint research report with Trocaire that will detail how Ireland can become a leader in global sustainable food systems.

RECOMMENDATIONS

Recommendation 1- Mainstream the pilot Results-Based Programme with an aim that the majority of agricultural schemes payments will be directed towards sustainable agriculture by 2030. A critical component of this will be ensuring the co-creation of the scoring system with farmers.

Recommendation 2- Ireland explicitly recognises the principles of agroecology as a key part of the solution in building sustainable food systems. Ireland should commit to increasing the proportion of ODA spending on agriculture and food systems directed towards the scaling up and out of agroecological initiatives.

Recommendation 3 -Agree appropriate sustainable agri-food metrics following input from national and international experts and relevant stakeholders and located within evolving international norms. These metrics should aim to go beyond the classic measures of agricultural productivity to assess food systems against their contribution to nourishing humans and bolstering environmental outcomes (biodiversity, diverse landscape, healthy habitats). This important task should be under the remit of an independent body with no conflicts of interests – see Recommendation 22.

Recommendation 4 -Ensure the provision of metadata, methodological notes, and sources for all government publications. Harmonise definitions and conceptualisations of key food systems concepts across government departments. Align with Open Data principles.

Recommendation 5: Ensure balanced stakeholder representation across the spheres of social, economic and environmental sustainability in the make-up of future stakeholder approaches to

developing, implementing and monitoring policies for a sustainable food system that is grounded in a human rights framework.

Recommendation 6: Update Ag-Climate in 2021 to reflect new national commitments to reducing GHG emissions to be set out in the forthcoming climate budgets. Aim to reduce ammonia emissions to 2010 levels. Include a greater emphasis on stimulating demand for organic produce in Ireland.

Recommendation 7: Include clear mechanisms for accountability and enforcement of targets set out in national policies.

Recommendation 8: Immediately invest more resources in research on the feasibility and value of regenerative agricultural practices in the Irish context. Place greater emphasis on social innovation alongside technological innovation.

Recommendation 9: Mainstream a food systems approach in all institutions and organisations involved in development cooperation, including the human rights and food sovereignty components. Specifically, ensure transparency of all public funding to demonstrate the mutual benefits of funding and ensure same is not disproportionately benefitting Irish businesses to the detriment of local markets in low-income countries.

Recommendation 10: Increase the quantity and focus of development cooperation flows for agricultural research, extension and education in low-income countries. Prioritise bilateral and multilateral investments in these areas towards support of indigenous institutions and bottom-up approaches.

Recommendation 11: Ratify the Nagoya protocol. Advocate for greater acknowledgement of traditional knowledge as a key part of the evidence-base for decision making regarding food systems. Advocate for more inclusive and fair policy and agricultural trade spaces, including a reform of the TRIPS agreement to eliminate oligarchic type market control of agri-businesses and the privatisation of biodiversity.

Recommendation 12: Work to ensure Irish agri-business entrench principles of policy coherence in all engagements with low-income countries, especially the principle of 'do no harm'. Ensure that Irish agri-business undertake a real strategic shift towards collecting locally produced produce from local family farms in export markets. For example, explore mechanisms to ensure Irish exporters reach the ECOWAS target of 25% local milk collection in West Africa by 2025. Put in place necessary supports to enable increases in local production within export countries.

Recommendation 13: Introduce effective Human Rights and Environmental Due Diligence legislation to ensure private sector compliance with a sustainable food systems approaches. Such legislation will ensure that companies are legally obliged to fulfil human rights and environmental obligations throughout their supply chain. To this end, Ireland to actively support and contribute to the development of an ambitious, effective and binding UN treaty on business and human rights, to regulate the activities of transnational corporations and other business enterprises.

Recommendation 14: Advocate for changes at EU and global level to relevant policy frameworks to ensure unsustainable food production around the world is phased out and sustainable methods of production are supported.

Recommendation 15: Ensure efforts for global leadership Ireland's extend beyond the UN Food Systems Summit. Ireland can provide leadership, for example, towards the achievement of SDG 2, including by building on its strong relationship with the Rome-based agencies to reinforce the mandate and role of the Committee on World Food Security.

Recommendation 16: Ensure adequate investment is made to support rural economies. Urgently implement government commitments to large-scale broadband access. Invest more in programmes that can bolster local supply chains (e.g. LEADER)

Recommendation 17: Invest more in fresh, nutritious and local produce. Increase subsidies for horticultural development to reduce the reliance on imported fruit and vegetables.

Recommendation 18: Invest more in Ireland's food identity. Increase funding for research into Ireland's food history. Create a food subject in schools to educate students on healthy diets and cooking options, the links between agriculture and human and environmental health as well as to promote domestic approaches to reduce food waste at the household level.

Recommendation 19: Establish clear targets to redirect responsibility for regulation firmly in the public sphere. Restrict or ban the (online) marketing of foods high in trans-fat, salt or added sugars to children and adolescents up to 19 years. Policies that promote this, particularly those that promote 'plant-forward' diets need to emphasise the need for a cap of starchy staple foods (e.g. at 50% of total dietary energy requirements).

Recommendation 20: Explore pathways forward to support the increase in the cost of food (e.g. via True Cost Accounting) alongside appropriate social safety net measures.

Recommendation 21: Increase funding to nutrition research in Ireland with a view to the majority of the nutrition-related evidence-bases and research being owned by the public sector.

Recommendation 22: Establish a national sustainable food systems body that provides space for the voices of all stakeholders – including the most marginalised in Irish society – to be heard and integrated into decision-making. Ensure adequate mediation processes are in place to manage potential barriers to consensus. This body should have a clear mandate to influence government policy making; be tasked with ensuring adequate representation of all communities and from social, environmental, and economic sectors; ensure coherence across all policies; develop adequate sustainable metrics for Ireland's food system components (from agriculture to retail) founded in scientific evidence and social and economic realities.

OXFAM IRELAND

Oxfam is a global development and humanitarian organisation that mobilises the power of people to fight inequality to end poverty and injustice. Around the globe, Oxfam works to find practical, innovative ways for people to lift themselves out of poverty and thrive. We save lives and help rebuild livelihoods when crisis strikes. And we campaign so that the voices of the marginalised can influence the local and global decisions that affect them. In all we do Oxfam works with partner organisations and alongside vulnerable women and men to end the injustices that cause poverty.

Last year, Oxfam Ireland, in partnership with Irish Aid, worked in over ten countries and reached 8.05 million people through our development and humanitarian programmes.

In Ireland, we advocate nationally and globally on a variety of issues, including financing for development, inequality, tax justice, women's rights and human rights in humanitarian crises. At EU level, Oxfam challenges EU policies to make them work for people in poverty. In Brussels, we work to influence key decision-makers in the EU institutions to ensure that EU policies affecting poor countries have a far reaching, positive impact on the lives of those most in need.

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