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

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** * * Headings in italics are directly quoted from the draft strategy * * **

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Executive Summary

The Common Agricultural Policy (CAP) was conceived to support farmers to produce food but today it has evolved into an environmental payment. The CAP budget has diminished over the years and today farmers find themselves doing more for less.

This strategy cannot make more farmers unviable. An economic impact assessment of this strategy's proposals must be carried out prior to implementation. The overarching objective of this strategy must be to clearly detail how viable farm incomes will be delivered.

The strategy must recognise Ireland as a sustainable producer of food. Irish farmers are already participating and engaging in schemes and practices to preserve our environment and reverse the effects of climate change. The carbon efficiency of Irish agriculture must be leveraged and carbon leakage must be avoided.

The environmental and climate measures within the strategy must be appropriate and balanced and cannot have a negative impact on farm incomes. Farmers are willing to face the challenge of climate change but they must be rewarded for doing so. Carbon removals must be acknowledged when calculating the carbon footprint of Irish farms. Regarding biogenic methane, the focus should be on reducing emissions rather than cow numbers.

The strategy's key priority must be to increase farm incomes in order to return a sustainable level of profitability. Sustainable food systems must be sustainable economically, environmentally and socially. When we achieve economic sustainability throughout the food chain and farmers receive a fair price for their output; environmental and social sustainability can be achieved.

Introduction

The Irish Farmers' Association is the largest national representative organisation in the country, with over 72,000 members. It is the recognised voice of Irish farmers in Europe and internationally. IFA represents farmers with Government, agri-business and retailers; lobbying and campaigning for improved conditions and incomes for farm families. We represent farmers in all sectors through our democratic structure of 29 County Executives and our ruling body the National Council, on which each county and each commodity is represented. Through our Brussels office and affiliation with COPA-COGECA, we maintain a full-time presence at EU level on behalf of Irish farmers. The Association promotes the ongoing development and competitiveness of Irish agriculture and the food industry, which is making an important contribution to Ireland's economy.

Context & Background

This strategy comes at a critical juncture for Irish farming. The impact of Brexit is already being felt in the sector and we are on the cusp of a new Common Agricultural Policy (CAP). Irish farmers are going to have their incomes devastated by the latest CAP reform proposals. The introduction of the new so called 'eco-schemes' could take up to 30% out of every farmer's Basic Payment. Farmers are now required to carry out additional environmental actions in order to receive a substantial portion of what is their basic payment under the current programme. There is a substantial risk that farmers with higher per hectare entitlements will face a cut in their Pillar 1 basic payment, even if they fully participate in eco-schemes because eco-scheme payments will be made on a flat-rate basis per hectare, rather than being paid as

a percentage of each farmer's entitlement per hectare. Furthermore, the impact of additional convergence will make more farmers unviable

Equally, the European Commission has published its 'Farm to Fork' to and Biodiversity strategies as part of the European Green Deal. The Programme for Government *Our Shared Future* and Ag Climatise – the National 'Climate & Air Roadmap' for the Agriculture Sector – set out significant environmental ambition for the sector. This ambition is already becoming a reality with sectoral carbon budgets among the measures being introduced in the Climate Action and Low Carbon Development (Amendment) Bill 2021. These 5-year budgets will allocate greenhouse gas emission ceilings for agriculture in light of the roadmap of sector specific actions outlined by annually updated Climate Action Plans. It is imperative that this process is flexible by accounting for innovations, emerging technologies, carbon removals, carbon leakage, the unique characteristics of biogenic methane and the special economic and social role of agriculture.

In all of this there is a danger that farmers will be saddled with higher costs, impaired output and reduced productivity. The European Commission has not increased the CAP budget to compensate farmers for carrying out additional environmental, climate and biodiversity measures. The original purpose of the CAP was to support farmers to produce food. It has since evolved beyond being a support to produce a secure supply of affordable food while ensuring farmers have a fair standard of living in stable markets. Equally, the CAP aspires to increase agricultural productivity by promoting technical progress and ensuring the optimum use of the factors of production, in particular labour. Alongside the specific objectives of the CAP set out in Article 39 TFEU[1], a number of Treaty provisions lay down other objectives, which are applicable to all EU policies and measures.

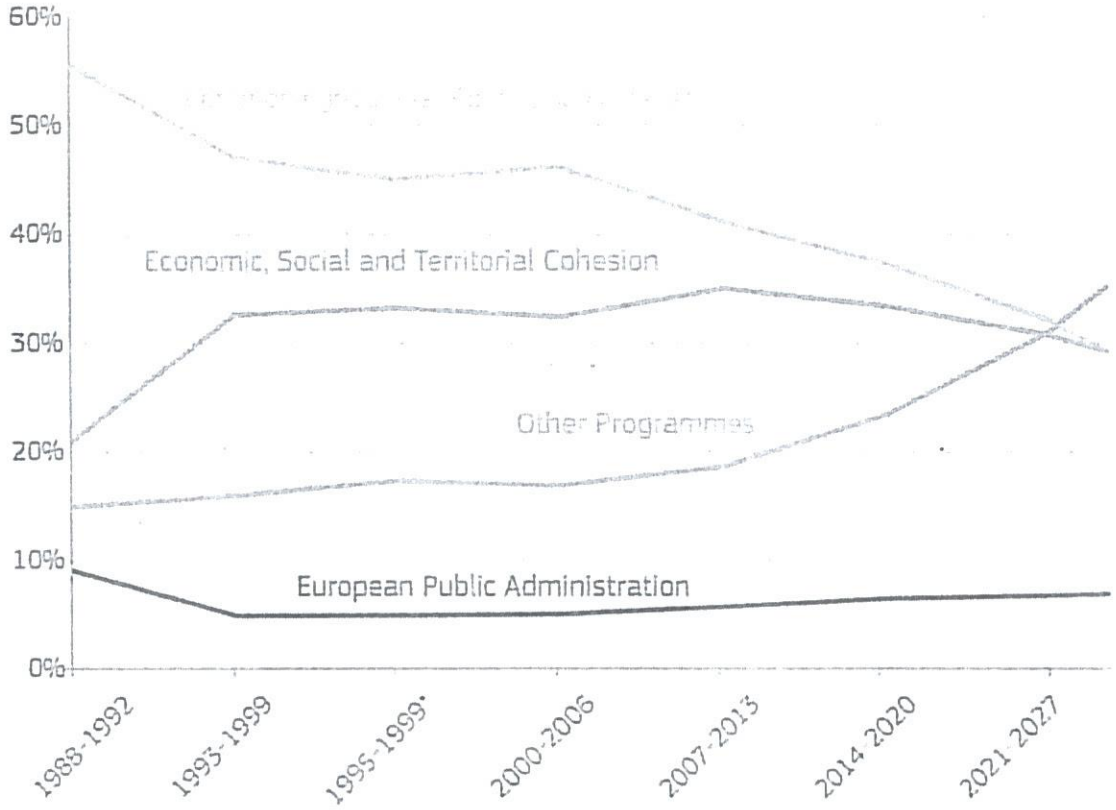
- On that basis, promoting a high level of employment (Article 9),
- environmental protection to promote sustainable development (Article 11),
- consumer protection (Article 12),
- animal welfare requirements (Article 13),
- public health (Article 168(1))
- and economic, social and territorial cohesion (Articles 174 to 178) are becoming objectives of the CAP in their own right.

However, as illustrated in Figure 1, the policy has become a diminishing part of the EU budget, while trying to achieve more objectives. Thus, the CAP is expected to deliver more but with an ever-decreasing allocation of the Multi-annual Financial Framework (MFF). Indeed, tackling climate change, delivering environmental protection and meeting societal demands are all vital to the sustainability of agriculture but resourcing these objectives out of CAP funding is reducing farmers' incomes and as a consequence undermining the sustainability of many farm businesses. The continued assault on farming incomes within the CAP is in direct contradiction with the essential purpose of the CAP and threatening the sustainable supply of affordable, high-quality food. Farmers have already demonstrated their willingness to play their part in the journey towards carbon neutrality. However, further devastation of farm incomes is not sustainable and render farm business unviable. The EU encouraged and the CAP incentivised farmers to improve and modernise their farms but today the CAP has become an environmental payment to reverse the changes farmers made in order to produce food more efficiently. Farmers must be fully

[1] Treaty on the Functioning of the European Union

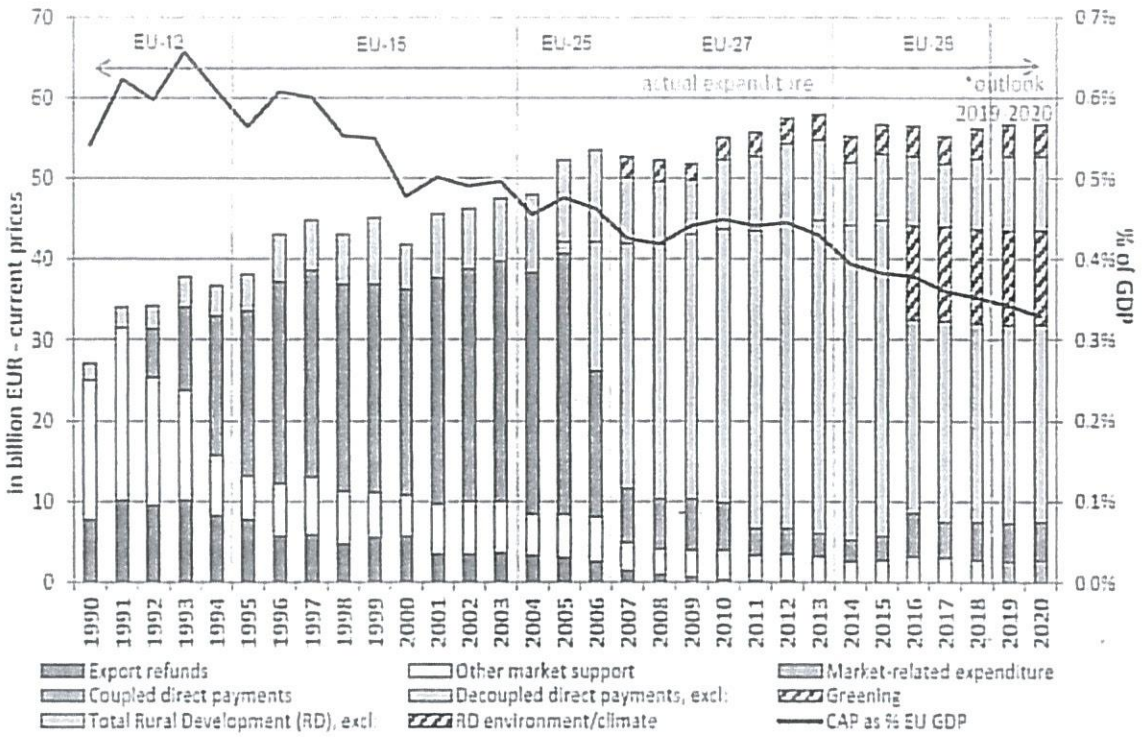
compensated for the actions they embrace in helping towards the transition to a climate resilient, biodiversity-rich, environmentally-sustainable and climate-neutral economy.

Figure 1: Evolution of CAP Funding and as a % of total EU Budget



Source: European Commission

Figure 2: Evolution of CAP Funding and as a % of total EU GDP



Source: European Commission

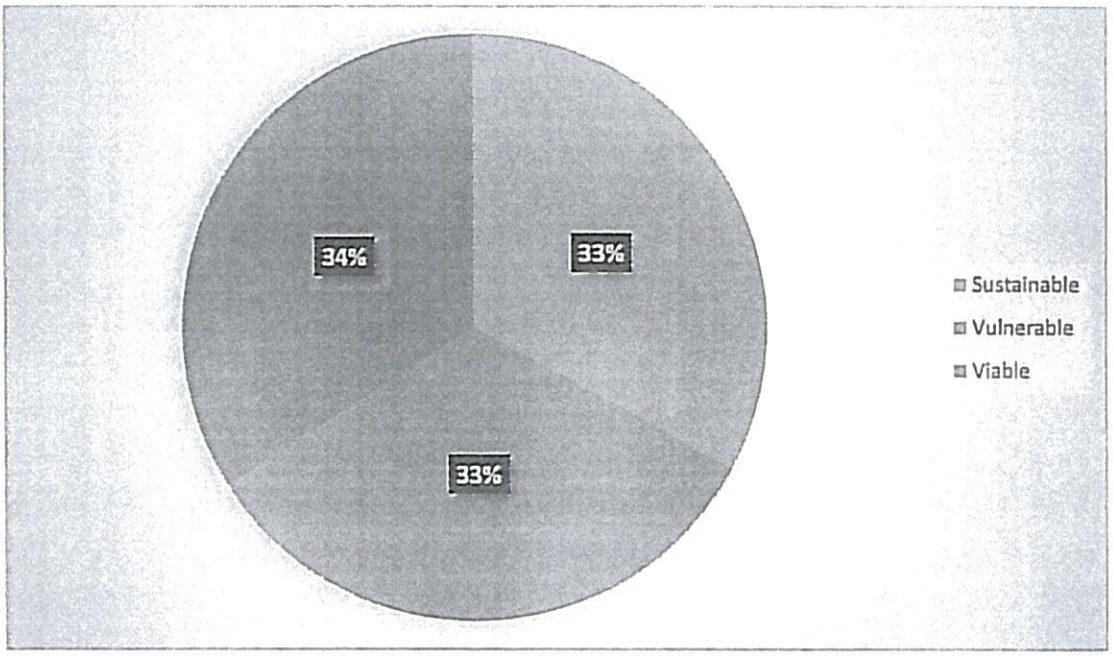
Figure 2 further highlights the reduction in the CAP as a percentage of overall EU GDP. The requirements placed on farmers in order to be eligible for payments have been increasing. This is contributing to the price-cost squeeze on farmers. The policy has evolved from market supports to direct payments per unit of output (coupled), to direct payments per hectare. In the last CAP programme, 30% of Pillar 1 payments were for greening measures and paid as a percentage of each farmer's per hectare entitlement. The reality is that the link between production and supports is now almost completely broken.

A new CAP programme is currently under negotiation in a 'Trilogue' process between the European Commission, the European Council of Agricultural Ministers, and the European Parliament. In tandem with these negotiations, the Department of Agriculture is currently devising a CAP National Strategic Plan for submission to the European Commission by the end of 2021. Neither this plan which will set out, in full detail, how the new CAP programme will be implemented in Ireland nor this strategy can be allowed to create more unviable farmers.

The Agri-Food Strategy to 2030 must not make more farmers unviable

Only 34% of Irish farmers are viable as illustrated in Figure 3.

Figure 3: Viability of Irish Farming

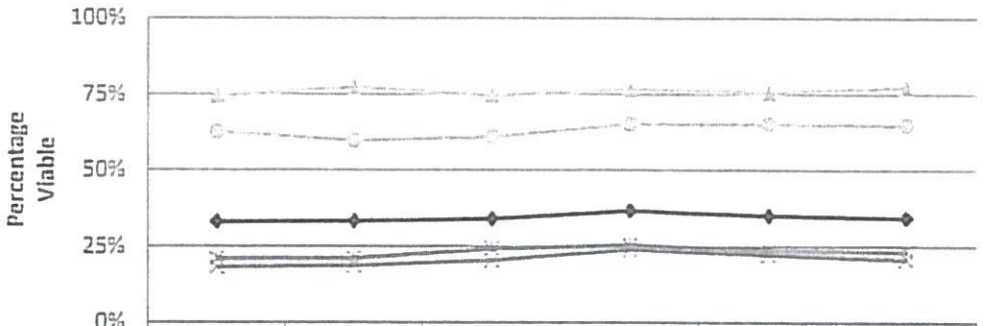


Source: Teagasc National Farm Survey 2019

A farm business is deemed to be viable if the farm income can remunerate family labour at the minimum agricultural wage and provide a 5% return on capital invested in non-land assets (e.g. livestock/farm machinery). A farm household is considered sustainable, even if the farm business is unviable, if the farmer or spouse are in receipt of an off-farm income. A farm household is considered to be economically vulnerable if the farm business is not viable and neither the farmer or spouse work off-farm.

The other reality facing Irish farming is the significant disparity between the various sectors. Figure 4 shows the rolling average for the percentage of farms in each sector which are deemed to be viable. The data is stark in terms of the future for cattle and sheep farms in particular. It must be borne in mind that these figures for viability are inclusive of Direct Payments.

Figure 4: Economic Viability by sector: 3 year rolling average 2014-2019



	2012-2014	2013-2015	2014-2016	2015-2017	2016-2018	2017-2019
Dairy	74%	77%	75%	76%	76%	77%
Cattle	18%	19%	20%	24%	22%	21%
Sheep	21%	21%	24%	25%	24%	23%
Tillage	63%	60%	61%	65%	65%	65%
All Farm	33%	33%	34%	37%	35%	34%

Source: National Farm Survey – 2019 Sustainability Report, Teagasc.

Drawing on the targets set out under the European Green Deal and constituent Farm to Fork proposals, the draft strategy is aiming for climate-neutrality in the agri-sector by 2050, with verifiable progress achieved by 2030. The Ag Climatise roadmap and the binding targets in the Climate Action and Low Carbon Development (Amendment) Bill 2021 outline how this objective will be achieved. It is clear that these targets will lead to a substantial increase in cost of production for farmers. While the strategy rightly seeks a detailed impact assessment of likely cost of these targets and measures on farm incomes and output, this request is not included in the executive summary.

Given how critical the issue is, IFA believes that the requirement for a detailed economic impact assessment of the strategy's proposals and targets. It is absolutely imperative that this is completed prior to implementation of any of these measures. The first step in this must be an immediate request to Teagasc to carry out an economic/cost impact assessment of the 'Farm to Fork' and Biodiversity strategies. The economic cost of these proposals and their impact on productivity and output at farm level is unknown. In addition, there must be a commitment that the Government will work with farmers to fund any cost impact of these measures. Farmers cannot be expected to bear both the burden and associated cost related to environmental sustainability. Environmental action and adopting such measures can reduce output and lead to reduced farm incomes. While farmers are willing to meet the challenge, we need to ensure that farmers are fully rewarded for their efforts. The overarching goal of this strategy must be to create and maintain viable farm incomes.

IFA supports the need to produce safe, nutritious food in an environmentally sustainable manner. However, high level animal performance is a key component to reduced emissions from production. The strategies referred to in this document, in particular the 'Farm to Fork' have set targets to reduce usage of fertiliser, pesticides and antibiotics which will have serious consequence for food production.

These criteria have the potential to increase production costs, exposing premium Irish produce to the displacement by cheaper substandard imports from non-EU countries. It is paramount that Irish farmers

receive a fair price for food from the market, above the costs of production. A recently published external study[2] on behalf of the Commission identifies this displacement of production as having a negative impact on environmental measures. This strategy must reflect this issue and focus more on ensuring production levels in Ireland are maintained as a positive contribution to a 'Climate Smart Environmentally Sustainable Agri-Food Sector'.

The Strategy must recognise Ireland as a Sustainable Producer of Food

Irish agriculture is one of the most sustainable in the world. Despite media commentary suggesting otherwise, Irish farmers produce food of the highest quality with a low environmental footprint.

Irish farmers understand that they have a unique role to play in meeting the climate change challenge, however, this must be done in a fair and balanced way. In dealing with the climate change challenge, it is imperative that Irish farmers' current sustainability credentials are fully acknowledged. The following describes some of these credentials in more detail:

- Irish dairy and beef output is extremely efficient from a carbon footprint perspective. Irish milk has the lowest carbon footprint in the EU while Irish beef has the fifth lowest.[3] Despite what many would lead us to believe, the carbon-efficient expansion of milk production in Ireland has helped displace approx. 4 million tonnes of carbon which would have been emitted had the equivalent dairy product been produced outside of Ireland.[4]
- Irish farming is a predominantly grass-based system. As a result, the use of direct energy (e.g. electricity) on Irish farms, at 56% of the EU average, is very low by European and international standards.[5]
- Agriculture is unique in its ability to remove carbon from the atmosphere by carbon sequestration. Grassland soils currently sequester approximately 440 tonnes CO_2/ha or an estimated 1,800 million tonnes CO_2 across all Irish mineral soils. National greenhouse gas (GHG) emissions are about 60 million tonnes per year; accordingly, our mineral soils store about 30 years' worth of emissions.[6]
- Agricultural emissions as a percentage of total national emissions have remained static since 1990 at approximately 35%. In the same period, emissions from transport have more than doubled from 9% to 20%. In addition, agricultural emissions actually reduced by 3.9% in 2019 due to a reduction in fertiliser use and liming, in spite of an increase in dairy cow numbers.7
- It is now accepted in many quarters that methane emissions from our livestock and dairy sectors, which are biogenic in nature, merit differentiated treatment with regard to climate change. The

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[2] Study on Future of EU livestock: how to contribute to a sustainable agricultural sector? Dr. Jean-Louis Peyraud (INRAE) and Dr. Michael MacLeod (SRUC), July 2020.
[3] Teagasc (2019) Agriculture and climate change Retrieved from: https://www.teagasc.ie/media/website/publications/2019/TResearch_Winter2019_AgriAndClimateChange_Web.pdf
[4] Teagasc (2019) Taking stock of sustainable growth. Retrieved from: https://www.teagasc.ie/media/website/publications/2019/Taking-stock-of-sustainable-growth.pdf.s
[5] Department of Agriculture, Food and the Marine (2021). Draft SWOT Analysis Preparations for Ireland's CAP Strategic Plan 2023-2027
[6] Teagasc (2020). Enhancing soil carbon sequestration to contribute to carbon neutrality on Irish farms. Retrieved from:https://www.teagasc.ie/publications/2020/enhancing-soil-carbon-sequestration-to-contribute-to-carbon-neutrality-on-irish-farms.php#:~:text=Why%20is%20Carbon%20sequestration%20important%3F&text=Ireland%20must%20reduce%20greenhouse%20gas,can%20help%20balance%20GHG%20emissions

Climate Action & Low Carbon Development (Amendment) Bill 2021 recognises the distinct characteristics of biogenic methane; this was a result of strong engagement by the IFA.

- The majority of Irish farms are not intensively stocked. Over 60% of Irish livestock farms are stocked at less than the equivalent of 0.33 cows per acre.[7]
- Irish farmers, through the Origin Green programme, were the first internationally to complete annual sustainability audits. To date, over 212,000 carbon audits have been undertaken on Irish dairy and beef farms. These audits show dairy and beef farmers have reduced their carbon footprint per unit of produce by 9% and 5% respectively since 2014.[8]
- Farmers are already taking many positive steps to make their farms more sustainable: - Over €80 million has been invested in Low Emission Slurry Spreading (LESS) equipment. - Sales of protected urea have more than doubled in the past year amounting to nearly 50,000 tonnes sold in 2020. - 96% of farmers have positively engaged with the Agricultural Sustainability Support and Advisory Programme (ASSAP) agreeing to put measures in place to help improve water quality.[9]
- While Ireland has a relatively low level of forest cover (approx. 11%), it has the third largest total hedgerow area in the EU, with an estimated 450,000 hectares or 6.4% of the land area. Since 1994, 6,605 kilometres of new hedgerows and more than 3.7 million trees have been established on non-forest land.[10] These hedgerows, which farmers continually upkeep, help to maintain biodiversity and sequester carbon.[11]
- Irish farmers recycle a huge proportion of the silage plastic they use annually. In 2020 famers recycled 79% (34,000 tonnes) of wrap and pit cover plastic while there was a 17% increase in the number of plastic fertiliser bags recycled.[12]
- Irish farmers have strong credentials in animal husbandry with the use of antibiotics well below the EU average. In 2016, Irish sales of antimicrobial agents for food producing animals were 42% of the EU average.[13]
- While water quality has declined somewhat in recent times, Irish waterways remain among the cleanest in Europe.[14] Ireland remains the only EU member state with 0% of groundwater stations reporting a nitrates concentration 50mg/l, the EU average stands at 13.3%.[15] Irish farmers are

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[7] CSO (2018). Farm Structure Survey 2016.Retrieved from: https://www.cso.ie/en/releasesandpublications/ep/p-fss/farmstructuresurvey2016/.

[8] Bord Bia (2019). Origin Green Progress Report Update. Retrieved from: https://www.origingreen.ie/globalassets/origin-green/og-publications/origin-green-progress-update-report-lr.pdf.

[9] Teagasc (2020). Agricultural Sustainability Support and Advisory Programme (ASSAP) Interim Report #1 2018 – 2019. Retrieved from: https://www.teagasc.ie/ media/website/news/2020/ASSAP-Interim-Report—1.pdf.

[10] Department of Agriculture, Food and Marine (2021). Forest Statistics – Ireland 2020. Retrieved from: https://www.gov.ie/en/collection/15b56-forest-statistics-and-mapping/#annual-forest-sector-statistics

[11] 12 Teagasc (2011). Teagasc Hedge Map. Retrieved from: https://www.teagasc.ie/media/website/publications/2010/The-Irish-hedge-map-version1_5690.pdf.

[12] Farmers Journal (2021). Irish farmers embracing fertiliser plastics recycling. Retrieved from: https://www.farmersjournal.ie/irish-farmers-embracing-fertiliser-plastics-recycling-598886.

[13] European Medicines Agency (2018). Sales of veterinary antimicrobial agents in 30 European countries in 2016. Retrieved from: https://www.ema.europa.eu/en/ documents/report/sales-veterinary-antimicrobial-agents-30-european-countries-2016-trends-2010-2016-eighth-esvac_en.pdf

[14] EPA (2018) Water Quality in 2019 An Indicators Report. Retrieved from: https://www.epa.ie/pubs/reports/water/waterqua/waterqualityin2019-anindicatorsreport.html

[15] EUROPEAN COMMISSION (2018) REPORT FROM THE COMMISSION TO THE COUNCIL AND THE EUROPEAN PARLIAMENT on the implementation of Council Directive 91/676/EEC concerning the protection of waters against pollution

doing their part in addressing water quality through programmes such as the ASSAP which is tasked with improving the water quality of 390 catchments through diagnostic measures and prescriptive actions.

- Over the past 8 years, 229 farmers across all counties in Ireland have volunteered to participate in the Smart Farming resource efficiency programme. This assisted them to make changes to their farming practices which if implemented would reduce their greenhouse gas emissions by 5-7% and their input costs by €5000 on average. The Smart Farming programme also engaged with over 5000 farmers through discussion groups. An additional 40 farmers have volunteered to take the Smart Farming challenge in 2021.
- Irish farmers have a strong track record of participating in agri-environment schemes. Today, 33% of Ireland's land is farmed under agri-environment measures compared to a 13% average at EU-27 level. Over 50,000 farmers participated in the Green Low-Carbon Assurance Scheme (GLAS), the most recent agri-environment programme.[16]
- Pig and poultry production is recognised and accepted as an environmentally efficient production system of protein and energy for human consumption. As both pigs and poultry are monogastric animals, and do not produce methane. Pigmeat and poultry meat produces 7 and 6 Kg CO_2 equivalent respectively.[17] Egg production produce even less at 4.5 Kg CO_2 equivalent. This is an extremely climate smart and environmentally sustainable use of resources.
- All stakeholders within the pig and poultry sectors have continually strived for greater efficiencies and better use of resources and this trend will continue. Improved genetics, advanced dietary formulations focusing on matching the exact energy and protein requirements of the pig/chicken at each stage of production/life cycle, will result in minimal loss of nutrients. Further still both these sectors have for many years focused on not just the protein requirements and crude protein content of their animals' diets, but the ideal amino acid profile makeup of that protein. This has all led to the most environmentally efficient use of land producing energy and protein crops, water and other energy resources used in the production of pigmeat and poultry meat and eggs.
- Pig and poultry farms must comply with the EU Nitrate regulations, and those pig and poultry farms operating above set production thresholds must operate within the terms of licenses governed by the EPA.

The inherent environmental sustainability of Ireland's system is the envy of our international peers yet we are moving towards production reduction, exporting production oversea and importing produce into Ireland.

The Irish countryside's unique landscape must be recognised. Ireland's rich network of hedgerows and fields must be preserved as a central element of the country's heritage. This heritage is an asset to the country and cannot be destroyed. Production must match the canvas it has to work with.

The imposition of further environmental regulation on Irish farmers will force farmers to abandon land and rely on the import of food from countries that cannot attain our level of environmental sustainability.

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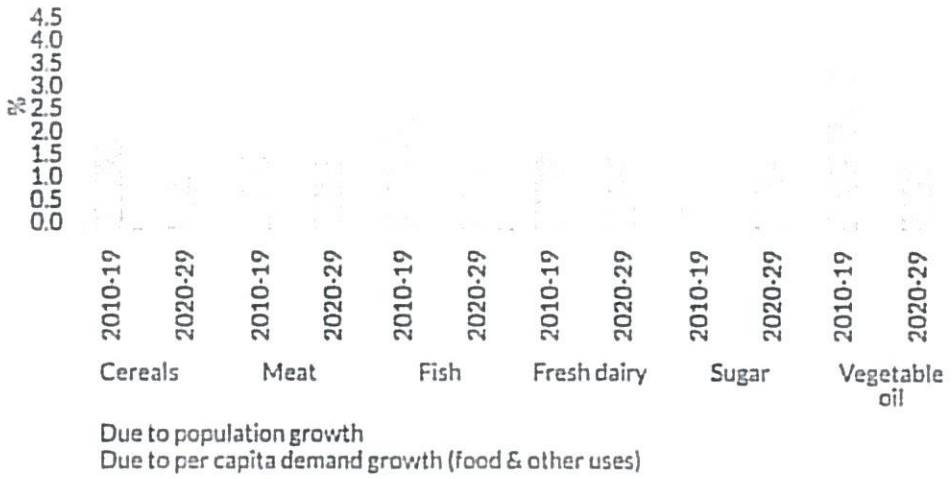
caused by nitrates from agricultural sources based on Member State reports for the period 2012–2015. Retrieved from:https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A52018DC0257

[16] European Commission (2018). Environment and Climate Action (Summary) - (EU27) - European Union 27. Retrieved from: https://agridata.ec.europa.eu/extensions/DashboardIndicators/Environment.html?select=EU27_FLAG,1.

[17] https://ourworldindata.org/food-choice-vs-eating-local

Figure 5 below shows the anticipated growth in global demand for key commodity groups over the next decade. Given the limited amount of land on the planet which is suitable for agriculture, we need to be conscious of the implications of reducing output from European Agriculture.

Figure 5: Annual growth in demand for key commodity groups



Note: The population growth component is calculated assuming per capita demand remains constant at the level of the year preceding the decade. Growth rates refer to total demand (for food, feed and other uses).

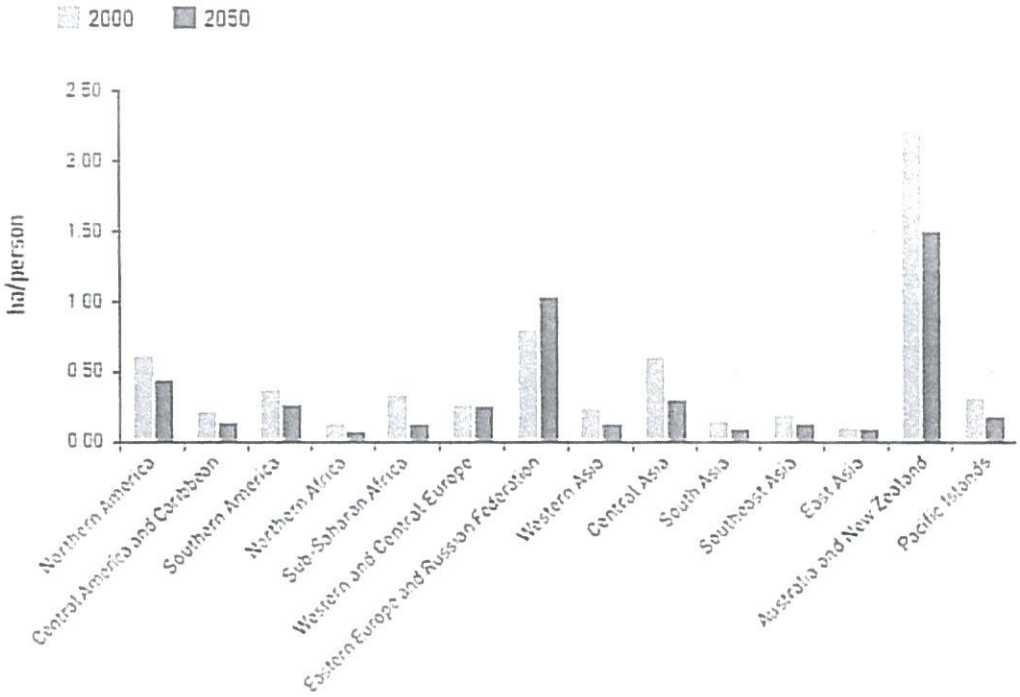
Source: OECD-FAO Agricultural Outlook 2020-2029, OECD/FAO.

The reduction in the funding for the CAP, as a percentage of the EU budget and the increased conditions being placed on farmers to be eligible for funding runs the risk of driving farmers from the land. While increased environmental ambition is an important part of public policy, it must be balanced with increased funding or a guarantee that farmers can gain a stronger return from the market place. Based on recent history and the way markets are structured it will be very difficult to achieve this.

Only about 40% of the world's land can be used for agriculture and only one third of this is suitable for arable crops. Figure 6 shows that the cultivated land per capita in 2000 and the anticipated cultivated land in 2050. This emphasises the need to make the most productive use of land available for food production.

In short, we need to keep Irish farmers farming.

Figure 6: Cultivated Land, Per Capita, 2000, 2050



Source: Fischer, et al. (2010) in The State of the World's Land and Water Resources for Food and Agriculture, Food and Agriculture Organisation of the UN and Earthscan, 2011.

As can be demonstrated from food price trends, the real beneficiaries of the CAP have been EU citizens. While farmers are willing to take on the mantle of first responders to the climate emergency, they are being asked to do more for less. Farmers have looked after the environment for generations and implemented actions to reverse climate change. This needs to be acknowledged before farmers can make further advances in rewarded-environmental protection.

There must be greater references to the actions already being undertaken by farmers under cross-compliance and through participating in various environmental schemes and adoption of technologies listed in the Teagasc Marginal Abatement Cost (MAC) curve. In addition, we need to move the narrative to talking about NET carbon on farms. The potential for carbon abatement and sequestration on farms must be measured and farmers must be rewarded for providing this public good.

The strategy must recognise the proactive approach taken by farmers to address water quality and biodiversity challenges. Farmers have moved beyond the statutory requirements of EU and national legislation, such as the nitrates regulation, and adopted voluntary on-farm initiatives.

Initiatives such as the ASSAP, which work in collaboration with farmers to identify and implement the right water protection measure in the right place on their farm must be expanded.

If we are to improve water quality and biodiversity, it is imperative innovative initiatives that work in collaboration and support farmers to adopt practices are introduced. Farmers have proven their willingness to engage in this work.

Mission 1: A Climate Smart, Environmentally Sustainable Agri-Food Sector

Independent analysis completed by Teagasc confirms that the targets under this mission will lead to a substantial increase in cost of production for farmers as well as significant additional investment in farm infrastructure. Overall, regardless of whatever targets are finally agreed, there needs to be a clear commitment in the strategy to complete a full cost/economic impact assessment of the targets prior to any implementation programme. In addition, there must be a commitment that the Government will fully recompense farmers for the increased costs and investments related to the introduction of revised environmental targets.

Climate neutral agriculture sector by 2050, with substantial verifiable progress by 2030

The challenge of setting such a target for the agricultural industry cannot be underestimated. Such a target will disrupt all sectors and reduce the viability of farmers to earn a living from the land. If we are to achieve a climate neutral agriculture sector by 2050, with substantial verifiable progress by 2030, it must be on a net carbon basis which recognises all existing carbon sinks and acknowledges the distinct characteristics of biogenic methane. While agriculture has a responsibility to protect the environment, the imposition of such a target without accounting for global carbon leakage arising from food production is ill-informed and more likely to lead to a rise in global GHG emissions. Food production must be encouraged in areas where it is most carbon efficient to do so. Any mid-term targets on GHG emissions needs to be appropriate and balanced to allow food production to continue in this country.

Water Quality – Agriculture will reduce nutrient losses to water by 50% by 2030

While mitigating GHG from agriculture requires global solutions, improving water quality requires local solutions. Farmers are committed to improving the water quality of their local catchments. Yet it is unclear as to how this target will be measured and what resources will be available to farmers to ensure this target is met. ASSAP has, in its first iteration, proved to be a positive template on how to improve water quality by collaborating with farmers to identify prescriptive actions that will benefit a catchment. Such a programme should be expanded to help farmers meet this target without the introduction of blanket regulations. Importantly, the focus should be on fertiliser inputs rather than nutrient losses.

ASSAP has demonstrated its ability to critically diagnose water quality issues relevant to a particular catchment and provide prescriptive recommendations to farmer to reduce pressures The programme must be used as a successful template going forward to improve water quality.

Mapping national soil carbon and nutrient profiles at a field scale will support balanced soil specific nutrient advice in order to reduce nutrient losses to water. Such measures are beneficial to optimise fertiliser use on farms, they must not place a significant cost on the farmer. Such measures must be financially supported.

It is vital that blanket regulation is minimised when it comes to protecting water. Blanket regulation places significant costs on farmers and yet may not result in any improvement in water quality. Instead, tailored actions toward specific issues must be prioritised.

In the context of water quality, aquaculture contributes to the control of nitrogen and phosphorous removal as shellfish are filter feeders which aids to reduce and mitigate eutrophication effects of Irish coastal waters. Shellfish, as filter feeders, actually increase water quality and habitat quality in Irish coastal waters.

Shellfish provide a nutrient removal service through feeding which enhances bacterial denitrification, sedimentation rates, reduces turbidity as well as contributing to nutrient sequestration.

Biodiversity – 10% of farmed area prioritised for biodiversity, and 30% of marine protected areas by 2030

The EU's sustainable supply of food cannot be sacrificed for environmental sustainability. Given the vital importance of hedgerows and other landscape features for the provision of wildlife habitats and their role in carbon sequestration, they should be included when measuring this target. In addition, measures should be provided for to encourage farmers to enhance hedgerows on their farms within an agri-environmental scheme.

At farm level, a study by Sheridan et al., 2017[18] revealed that at individual farm scale, an average of 73% of the land surveyed comprised agriculturally productive (mainly improved grassland) habitats. Marginally productive habitats (mainly extensively managed grasslands) accounted for an average of 11% of farm area, while other semi-natural habitats (mainly hedgerows) accounted for an average of 13%, with the remaining c. 3% under built ground.

Air Quality

This target is legally binding. Taking that into account, farmers must be supported to use protected urea and LESS to mitigate ammonia emissions.

IFA welcomes the recognition that globally fragmented climate policies can lead to carbon leakage, which has been shown to have implications for GDP growth, trade, emissions and business decisions. The strategy must put forward measures so Irish farmers are not disadvantage in the market place.

The strategy must ensure that the method methane emissions are calculated reflect the most to date science and how inventories are developed. Research by Oxford University led by Myles Allen[19] has demonstrated that the current calculate methane emission is not appropriate. It is also referred to in the Programme for Government *Our Shared Future* and the recently published Climate Action and Low Carbon Development (Amendment) Bill 2020.

Carbon sequestration has to be acknowledged in the existing natural infrastructure including pastures, hedgerows, peatland and forestry. The concept of additionality has to be scrutinised.

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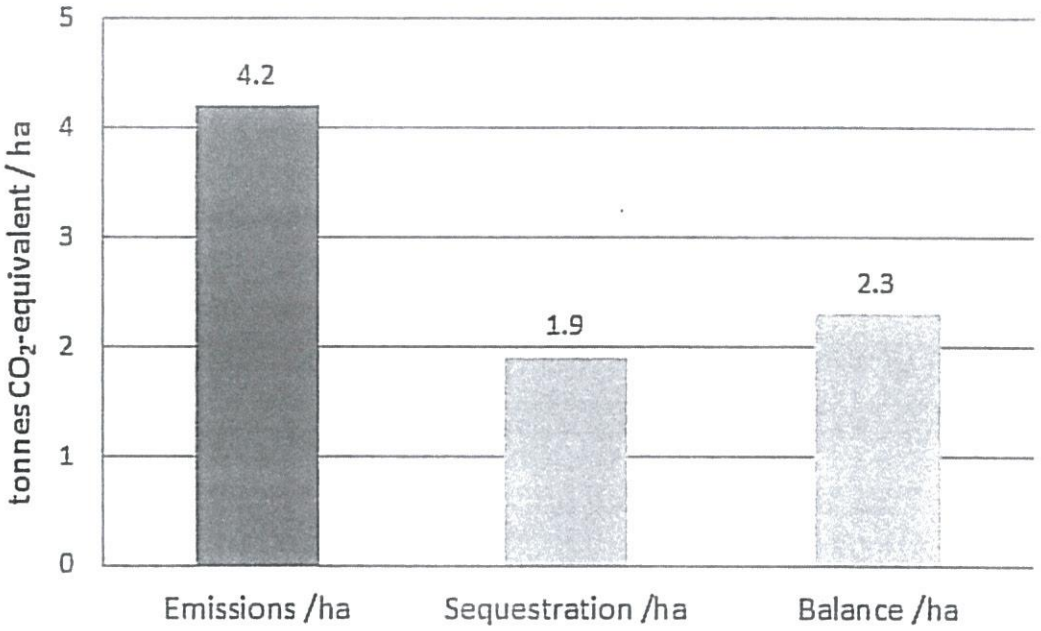
[18] Farmland habitat diversity in Ireland Sheridan, H.1 , Keogh, B.1 , Anderson, A.1 , Carnus, T.1 , McMahon, B.J.1 , Green, S.2 , Purvis, G.1

[19] A solution to the misrepresentations of CO2-equivalent emissions of short-lived climate pollutants under ambitious mitigation. Myles R. Allen, Keith P. Shine, Jan S. Fuglestvedt, Richard J. Millar, Michelle Cain, David J. Frame & Adrian H. Macey, 2018.

Figure 7: Carbon balance per ha on a typical Irish beef farm



Source: Teagasc 2020

Ammonia is the GHG of greatest concern from pigs and poultry production. Mitigation measures to reduce the volumes of ammonia released during production and lost during storage of slurry/litter are being tested and implemented across commercial farms for a number of years. Many peer-reviewed and internationally recognised researched methods on mitigation measures are coming into commercial operation on pig and poultry farms and this development will see the continuing control and mitigation of GHG emissions (ammonia) from these sectors.

The development of low emission slurry application systems and the subsequent Government policies to promote their practical implementation at farm level have already contributed to a reduction in GHG emissions. Measures such as these and the continuing refinement of pig and poultry diets in order to reduce protein loss in the form of urea in urine excretion, must be taken into account when determining a bench mark and subsequent targets for both the pig and poultry sectors to realistically achieve by 2030. Both these sectors have been on a trajectory towards environmentally sustainability from the past 20 years and this journey and measures already undertaken must be taken account in setting targets and goals that can be realistically and sustainability achieved.

Biogenic methane reduction of 24-47% by 2050, with an interim target of a minimum 10% reduction by 2030

This target needs to be critically assessed. Crude estimates suggest that this target would result in a reduction in the suckler herd of c. 300,000 suckler cows or a reduction in the dairy herd of 200,000 dairy cows. Either would have a detrimental impact on the viability of thousands of farms across the country.

Given the cyclical nature of methane production and sequestration via ruminant digestion, it must be treated differently. While emissions from agriculture have remained static over the past 30 years, emissions from transport have more than doubled.

Such a target should be back-loaded to allow time for the development of methane mitigating additives that can be fed to ruminants. The use of 3-NOP as a methane inhibitor looks promising.[20] Such inhibitors could reduce emissions without the need to reduce herd size (vital to maintain incomes). Research of methane mitigation via the use of additives must be prioritised.

Annual chemical nitrogen use not to exceed 325,000 tonnes by 2030

Optimising soil fertility is a critical component of meeting such a target. Farmers should be incentivised to lime soils with sub-optimal pH and improve soil indices for phosphorous and potassium to ensure that nitrogen use via inorganic fertilisers is optimised.

Equally, the use of organic manures must be optimised. The use of pig slurry and poultry litter should be encouraged on all farms as a suitable alternative to inorganic fertilisers. An immediate review of the protocol allowing slurry exports off farm needs to be conducted. The introduction of an online slurry export portal without adequate consultation with farm representatives will undermine our potential to maximise the use of slurry as an organic source of fertiliser.

Farmers must be supported through the provision of grant aid to increase slurry storage on farms. This includes existing farms with insufficient storage.

Nitrous Oxide emissions associated with chemical fertiliser use to reduce by half by 2030

The strategy aims to reduce nitrous oxide emissions associated with chemical fertiliser use by 50% by 2030. The use of protected urea and tailored fertiliser plans must be promoted to realise this target

Achieve a minimum 26.8 Mt CO_2 eq. abatement through LULUCF (Land Use, Land-Use Change and Forestry)

In order to achieve a minimum 26.8 Mt CO_2 eq. abatement through LULUCF there must be an overhaul of the national forestry policy. The approval process must allow for 8,000 ha of annual planting compared to the current rate of 2,500 ha per annum. The failure of forestry policy cannot rely on other sectors to compensate for its shortcomings.

From a Carbon perspective, reduce the management intensity of a minimum 40,000 hectares of peat based agricultural soils with an ambition to substantially increase over the decade.

Reducing the management intensity of a minimum 40,000 ha of peat based agricultural soils is only achievable with the implementation of a properly funded programme to fully compensate farmers for the impact of reduced management intensity.

Genotype the entire national herd

This target must be accommodated for under CAP Pillar 2 funding or the €1.5bn carbon tax fund for an agri-environmental scheme as promised in the Programme for Government. Turnaround times for results need to be assessed prior to blanket application.

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[20] Reducing enteric methane emissions from dairy cattle: Two ways to supplement 3-nitrooxypropanol D.Van Wesemael[12]L.Vandaele[1]B.Ampe[1]H.Cattrysse[1]S.Duval[3]M.Kindermann[3]V.Fievez[2]S.De Campeneere[1]N.Peiren[1]

Increase the number of dairy herd milk recording from 50% to 90%

Ensuring that adequate resources are available are critical to achieving this target.

90% of all slurry application by low emission equipment by 2027

The target of 90% of slurry application by low emission equipment should be by 2030 rather than 2027. Continued support via TAMS is necessary to achieve this target.

All external slurry stores to be covered by 2027 to mitigate ammonia emissions.

A full assessment of cost of covering all external slurry stores by 2027 must be completed prior to adopting this target. The cost of this is likely to be significant – accordingly, substantial government support will be required to ensure the cost of this measure is not borne by farmers.

Forestry: Increase afforestation and double the sustainable production of biomass from forests by 2035

If the 8,000-hectare afforestation programme as set out in the Climate Action Plan is to be achieved the replanting obligation must be removed. In addition, the forest licence systems need to be reformed and simplified to encourage farmers to plant more trees on farms. The current costs and bureaucracy associated with planting small areas are a major barrier.

Organic farming: Reach 6% of Utilised Agricultural Area (UAA) by 2030

Some 74,000 ha of Ireland's UAA is now under organic production. There is approximately 4.4 million ha of UAA in Ireland meaning that, on an annual basis, more than 20,000 ha of additional land must be under organic production to reach this target. This objective is unattainable without further detail on how the sector can achieve this ambitious growth. Although organic expansion is explicitly mentioned throughout the document the sector is currently under resourced regarding investment, market research, production research and development, and specialised advisory services. The document should make clear provision for the development of these important aspects as the area cannot viably expand without it. Enhanced marketing research and support to stimulate demand and increased appropriate targeted supports to facilitate investment, conversion and maintenance of land under organic production.

The organic sector has a part to play in the development of a climate-neutral agri-food system by 2050, and the closer we need to get to climate-neutrality, the greater the need for carbon-sequestering land uses that also provide food. Targets need to be set in this section for the contribution the sector can make to the 26.8m tonnes CO_2 eq. abatement through LULUCF highlighted on page 48.

Farmers in both pig and poultry sectors will be very willing to explore possible alternatives, less efficient methods of production such as organic production if there is a sustainable, market driven demand for these products. There is a conundrum here that does not sit well with farmers or IFA members. Organic pig, poultry and egg production is a less efficient system of production, requiring increased resources at almost every stage of production and being a greater emitter of CO_2 eq. per kg of production.

Seafood: Achieve 30% of marine protected areas by 2030

The strategy must give full recognition to the role of the aquaculture industry as a carbon efficient source of sustainable protein. Aquaculture provides for one of the most carbon efficient sources of protein, when there is an increasing demand globally for sustainable sources of protein.

IFA is a member of an expert group that is working with the Department of Agriculture, Food and Marine to expand Ireland's network of Marine Protected Areas into the future.

The Irish Aquaculture sector complies with obligations outlined in a number of environmental laws such as; Habitats Directive 92/43/EEC, Birds Directive 2009/147/EC, Water Framework Directive 2000/60/EC, Consolidated Environmental Impact Assessment Directive 2014/52/EU; and under the current aquaculture licensing system, the aquaculture sector is required to comply with more environmental legislation than any other sector in the marine space, thereby ensuring the healthy and sustainable use of Ireland's seas.

The Programme for Government, aims to investigate the recognition for the enormous 'blue carbon' potential that the ocean has to offer in tackling climate change but appreciates that further scientific research is needed to understand and develop this potential. Consideration must be given to the role of the aquaculture industry as a carbon efficient source of sustainable protein. Aquaculture provides for one of the most carbon efficient sources of protein, when there is an increasing demand globally for sustainable sources of protein. Appropriate recognition must be given to the aquaculture and its contribution to marine ecosystem services which make a substantial contribution to welfare, health and economic activities every year. IFA Aquaculture welcomes the draft 'Economic and Social Assessment of the Irish MSFD area' which is included in the 'Public Consultation on the Marine Strategy Framework Directive 2008/56/EC'. Fisheries & aquaculture worth an estimated €664 million in terms of output value from Irish waters, with carbon absorption services of 42,647,000 tonnes valued at €818.7 million - consideration must be given to the role aquaculture has to play in this regard, through the National Mitigation Plan, the National Adaptation Framework, and the National Development Plan.

Seaweed is a high growth plant which can provide significant environmental, and in rural coastal communities, livelihood benefits. Seaweed aquaculture farming is continuously developing in Ireland with the number of aquaculture licences for seaweed farming increasing in recent years. One of the main uses for farmed seaweed being investigated is its use as a feed additive reducing methane emissions in ruminant livestock. Asparagopsis species has been shown to reduce methane in beef cattle by over 80% in research trials - Asparagopsis is a natural, proven technology for reducing methane emissions in ruminant livestock which has huge potential to add value to Irish seaweed aquaculture as a viable industry.

Put in place more targeted agri-environmental schemes under the next Rural Development Programme (RDP) to protect and enhance Ireland's habitats and species

The design of further results-based agri-environment schemes, which the strategy is seeking, must be in a way that delivers the funds to the primary producer. While we recognise that agricultural consultants and planners will play a part in these schemes, leakage of funds away from farmers must be eliminated where possible.

Bioeconomy

Sustainable management in agriculture, forestry and aquaculture is a basic prerequisite for producing the raw materials for the bioeconomy. The transition to a bio-based economy can only be successful if the primary food sector is supported to increase production and efficiency against the backdrop of growing environmental challenges. To support farmers' transition strategic actions should include:

- Public awareness campaign targeted at farmers should be developed, producers they are key to the successful realisation of bioeconomy projects at local, regional and national level.
- While the knowledge and technical potential of the bioeconomy has increased in recent years, significant gaps still exist. Valorisation and demonstration projects should be supported to make the transition from research to production possible, particularly at farm and community level. The establishment of collaboration networks between producers and relevant stakeholders would drive adoption.
- The development of regional biomass trade and logistic centres (BTLC) that optimise the sustainable mobilisation of Ireland's biomass resources and improve the economic effectiveness of production, must be a key priority in the policy statement.
- The farming community is well positioned to facilitate microgeneration solar, anaerobic digestion and other potential farm scale renewables. This must be supported by a clear policy framework and easy to understand and implement, financial incentives to encourage farmers to participate. The rollout of renewable technologies among the farming community has the potential to:
    - reduce annual running costs and to generate additional income streams on farms;
    - contribute to national decarbonisation efforts and renewable energy targets and;
    - create employment and positive spill over effects for the wider economy.

Roll out 'Carbon Farming'

While hedgerows and other non-forest woody features might not sequester enormous amounts of carbon compared to the potential of grasslands, their inclusion in national emissions inventories is, nevertheless, absolutely imperative.

Scale up renewable energy (RE) sources, especially anaerobic digestion and biorefining, and solar PV and energy efficiency.

Farmers want to be central players in Ireland's energy transition. They recognise the opportunities offered by microgeneration to produce energy for their own use but also to diversify their farm income by selling excess energy to the grid and enhancing the sustainability of their farm business. Ireland's adoption of renewable technologies at farm level is well below the European average. In 2018, Ireland ranked 23rd out the EU-27 countries for renewable energy from agriculture, producing just 2.6% compared with the EU-27 average of 12.1%. To meet our renewable energy and emission reduction targets it is vital that farmers and communities are supported and that barriers are removed, so they can be central to Ireland's future energy generation.

There are multiple barriers in the recently proposed Microgeneration Support Scheme that limit uptake and hamper farm and community-based microgeneration deployment. To remove these barriers and support widespread uptake the following changes are proposed:

- In combination with Clean Export Guarantee (CEG) payment, a capital grant support should be available to overcome the high initial investment costs.
- Zero cost access and use of the grid for microgeneration installations under 50kW microgeneration.
- Removal of the self-consumption limit of 70% to provide low energy users opportunities to generate and export renewable energy.
- Removal of the Building Energy Rating (BER) rating requirement.
- A streamlined consistent application process with defined timelines for planning decisions.
- Domestic residence and farm buildings should be linked using private wire systems so they can share electricity produced.

Immediately implement the Ag Climatise Roadmap

Already it is abundantly clear that measures within Ag Climatise are being undermined by the Climate Action and Low Carbon Development (Amendment) Bill 2021. The treatment of biogenic methane and its associated targets described in this strategy differ to those described in Ag Climatise. It is vital that the agricultural industry maintains its existing herd size and that this strategy acknowledges the reality that production reduction in Ireland will lead to carbon leakage. It is equally important that time is provided to develop the role of additives for methane reduction, review emission factors for methane and critically examine the rate of carbon sequestration potential of our soils.

Under the auspices of the 2030 process, produce detailed plans by Q2 2022 to manage the sustainable environmental footprint of the dairy and the beef sectors.

The development of such plans requires farmer's input. Actions without comprehensive plans need to be thoroughly assessed. It is critical that the Climate Action and Low Carbon Development (Amendment) Bill 2021 recognises the distinct characteristics of biogenic methane. Equally so the Climate action Bill must account for carbon sequestration on farms.

Origin Green 'Stretch Targets'

The strategy outlines that "Origin Green now needs to adapt to a higher level of ambition and to achieve 'stretch targets' with participants." Firstly, it is unclear what these 'stretch targets' relate to. Secondly, any increase in Origin Green targets must be done in full consultation with farmers and their representatives in Bord Bia.

Enhance the Environmental Sustainability of the Seafood Sector

IFA welcomes the ambition to produce a development plan for the Marine sector (a successor to 'Harnessing Our Ocean Wealth'), outlined in the Programme for Government, which must have a cross-departmental approach and commitment for Department of An Taoiseach, in particular the reference to a 'greater focus on stakeholder engagement' – this must include the Irish aquaculture sector as stakeholder with a significant contribution to make to sustainable marine development.

The National Strategic Plan for Aquaculture Development, continue to provide a broad direction to guide the ongoing development of sustainable aquaculture. Irelands National Strategic Plan for Aquaculture Development must be reviewed in line with EU Guidelines - the Strategic Guidelines for Sustainable EU Aquaculture are currently being drafted by the EU Commission (DG MARE). These guidelines will be an

update of the previous EU guidelines adopted in 2013, which are being reviewed to support Member States and the sector in further developing aquaculture production in the EU and ensuring the sustainability and competitiveness of this economic activity.

In line with the EU Biodiversity Strategy, develop comprehensive legislation for the identification, designation and management of Marine Protected Areas (MPAs) in Irish territorial waters - Target of 10% under the Marine Strategy Framework Directive as soon as is practical and aim for 30% of marine protected areas by 2030. IFA Aquaculture is involved in the Marine Protected Areas (MPA) process required by MSFD, which may result in new protected areas – IFA Aquaculture is a member of an expert group that has been established in help advise the Department on a process for expanding Ireland's network of Marine Protected Areas into the future.

In the organic salmon aquaculture industry, ensuring a sufficient and predictable availability of product to meet market demand at various times has always been a challenge. In recent years, with increasing pressure on the organic salmon market it is becoming increasingly necessary to maximise revenue from raw material. Maximising the value from what we have and operating in a circular economy will lead to better returns from the Irish Seafood sector and in particular Irish Organic Salmon aquaculture. Key strategic initiatives for the Irish Seafood sector include placing an emphasis and ensuring that added value processing of seafood that's place in Irish processing plants. This is to ensure that fish/shellfish labelled as Irish is farmed, produced, processed and packed in Ireland will create the opportunities in coastal communities.

The potential for waste and bi-products should also be investigated with particular emphasis on opportunities for circular economy initiatives (reducing waste to minimum or zero). The added value of shellfish bi-products and waste shell which can be re-used as biomaterial for water and wastewater treatment systems, among many other uses should also be further investigated.

Aquaculture production will be key to meeting global demands for seafood produce in the coming years. As such, Irish Aquaculture production needs to be part of the global move towards meeting these demands. With a growing emphasis on circular economy and sustainable, efficient food production systems emerging from EU and National policy. Innovation, technology and efficient aquaculture farming practices will drive the adaptation needed to fulfil 'EU Green Deal' goals of developing sustainable food production systems and ensuring food security. Innovation and efficiency are central elements to achieving these ambitious targets. Smarter, more efficient food production systems are what is needed in order to increase production sustainably and ensure secure food sources into the future. Research and innovation are key drivers in accelerating the transition to sustainable, healthy, and inclusive food systems from primary production to consumption.

Greenhouse Gas Emissions

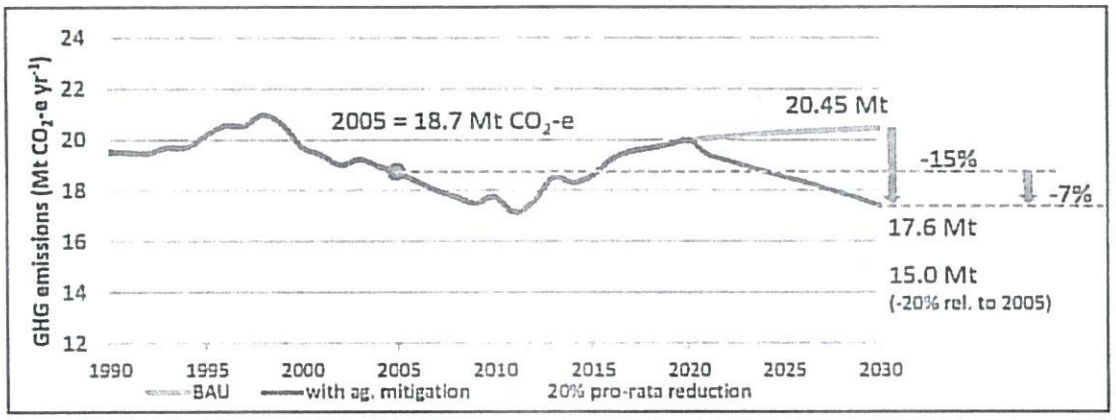
One particular aspect of this relates to the emissions produced by Agriculture. In our view, the focus must move away from reducing food output towards reducing emissions per unit of output. The table below is a depiction of Teagasc's Marginal Abatement Cost Curve for Agriculture.

It demonstrates that by the adoption of various technologies and through changes in certain practices, Irish Agriculture has the potential to reduce our emissions by 15%. This is without taking into account potential advances in technologies, particularly feed additives, to reduce Methane.

Ruminant animals are a tremendous asset to the planet as they can convert grass, which is inedible for humans, into nutrients for human consumption. Approximately 2/3 of the agricultural land on the planet is only suitable for growing grass. The priority must be to make bovines in particular more efficient so that they can produce more nutrients for less emissions. This is attainable.

In any event the expansion in ruminant animal numbers in Ireland has been overplayed. Cattle numbers in Ireland are lower than they are in the mid 1990's [See Figures 8, 9 and 10]. The emphasis must be on reducing emissions per unit of output rather than reducing output.

Figure 8: Agricultural GHG emissions from 1990 and projected to 2030, without (blue) and with (red) mitigation. The orange line represents a pro-rata 20% reduction in sectoral emissions by 2030.



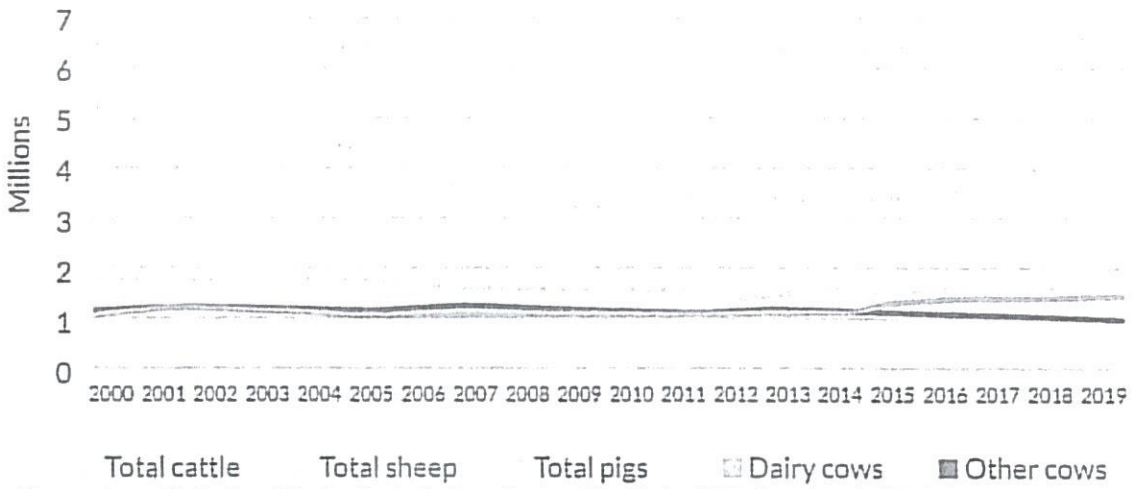
Source: An Analysis of Abatement Potential of Greenhouse Gas Emissions in Irish Agriculture 2021-2030, Teagasc, 2019.

Figure 9: Number of ruminants in Ireland (Thousands)

Year	Cattle	Sheep
1977	7,124	3,534
1987	6,545	5,595
1997	7,533	8,132
2007	6,891	5,522
2017	7,364	5,197
2018	7,349	5,109
2019	7,209	5,146

Source: Statistical Yearbook of Ireland, Central Statistics Office (adapted).

Figure 10: Cattle, Sheep and Pig Livestock numbers, 2000 – 2019



Source: Annual Outlook and Review for Agriculture, Food and the Marine 2020, Department of Agriculture, Food and the Marine

Carry out baseline biodiversity studies including habitats and hedgerows on every farm to inform future policy development and measure progress.

Farms must be rewarded for carbon sequestration potential of existing landscape features.

Ireland will play an active and constructive role in the development of measures to realise the objectives for pesticide use reduction in the EU Biodiversity Strategy 2030 and the Farm to Fork Strategy.

To optimise clover in our swards it is critical that we maintain the use of clover safe pesticides.

Pigs & Poultry

When looking at Ireland's pig and poultry primary production sectors in tandem in the context of this strategy, there is great potential for both white protein meat producing sectors, and egg production, to achieve goals and targets outlined in this draft strategy. Even further, similar to the dairy sector, which had ambition growth targets in previous strategies, the pig and poultry sectors offer a sustainable opportunity for further growth, both in terms of value and output, while achieving key objectives within this strategy.

Mission 2: Viable and Resilient Primary Producers with Enhanced Well-Being

The strategy must prioritise the economic viability of farmers

IFA welcomes the strategy's three-pillar approach to sustainability. It is vital that we strive to achieve economic, environmental and social sustainability in the agri-food sector. Each strand of sustainability is indispensable and to neglect any of the three will prove detrimental to the future of the sector and success of the strategy. Without the needs of primary producers being recognised and taken into account right through the food production chain, up to and including the consumer, there is little chance of this strategy being a success. First and foremost, the strategy must strive to improve the livelihoods of all primary producers. The strategy's key priority must be to increase farm incomes to return a sustainable level of profitability. Only then, will farmer be in a position to adopt additional environmental and climate measures.

Ultimately the price pressure through the food production chain has seen viable farms number drop significantly.

The mission of viable and resilient primary producers must precede climatic and environmental sustainability. In order to develop an environmentally sustainable sector we must first ensure there are viable farmers/primary producers in place. Without creating and maintaining economically sustainable farmers, this strategy will fail to deliver environmental and social sustainability. Sustainability can only become a competitive advantage for Irish agriculture if there is either an increased farmgate return or there is appropriate government support. The strategy is lacking in meaningful ambition and detailed proposals to deliver a viable income for farmers. Targets that demonstrate growth in family farm incomes must be clearly identified within the Teagasc National Farm Survey. The strategy must strive to improve the livelihoods of all primary producers, there is no point in being competitive if it's driving down income. Similarly, there's no point in increasing agri-food exports unless farmers receive their fair share for their output.

Many farms are comprised mainly of small-scale family farm structure's providing significant societal, environmental and economic value to the country. There are some large-scale farmers who can avail of improved efficiencies to some extent. Regardless of scale, direct supports are an integral part of the viability of these farms. Increased efficiencies in terms of production will have minimal impact in the longer-term viability of these farms due to their scale and for larger farms the continually increasing production costs.

To provide for the viability and well-being of the primary producers in these areas the focus must be on ensuring the levels of direct support make these sectors viable and by extension sustainable to allow them continue to contribute into the future positively from a societal, environmental and economic perspective in rural Ireland and nationally. IFA has continually called for €300/suckler cow, €30/ewe and a tillage scheme with adequate funding to contribute towards delivering viable farm incomes.

We must examine ways of obtaining a premium in markets for our extensive production systems in beef and sheep. Achieving economic sustainability on Irish farms will go a long towards realising social sustainability and addressing issues such as social isolation and generational renewal by contributing to rural vibrancy.

Ireland's Food Policy

Food prices must increase if farmers are to receive a fair share for their emissions abatement, eco-system services and production output. Unfortunately, there is a substantial dichotomy evident currently; the regulatory burden on farmers is constantly increasing while food prices, in real terms, have never been cheaper. As outlined, the CAP funding and the market are failing deliver a viable income to two thirds of Irish farms. The hope that consumers will pay more for higher production standards is entirely theoretical while the current trend is towards lower food prices, with this downward price pressure being passed back to the farmer. This fundamental dichotomy must be clearly called out in this strategy along with proposals to address it. The below cost selling of food is unsustainable and is in direct conflict with the sustainable food systems which this strategy aspires to deliver.

Food prices in Ireland have fallen in each of the last 6 years as demonstrated in Figure 11. This has been driven by increased competition in the retail sector.

Figure 11: Annual average percentage change in Consumer Price Index, 2009 – 2019

Source: Consumer Price Index, Central Statistics Office.

Over a longer term the table below shows that the percentage of household income spent on food has reduced significantly from 27.7% in 1980 to just 14.7% in 2015/2016.

Figure 12: Changes in distribution of total household expenditure, 1980 to 2015-2016

%							
Commodity Group	**1980**	**1987**	**1994-1995**	**1999-2000**	**2004-2005**	**2009-2010**	**2015-2016**
Food	27.7	25.2	22.7	20.4	18.1	16.2	14.7
Alcoholic drink and tobacco	7.2	8.0	7.7	7.6	6.0	4.9	3.3
Clothing and footwear	8.9	6.7	6.4	6.1	5.4	4.9	4.0
Fuel and light	6.1	6.3	5.0	3.8	3.9	4.4	4.6
Housing	7.2	8.8	9.8	9.6	12.0	18.2	19.6
Household non-durable goods	1.9	2.1	2.3	2.5	2.2	2.0	2.0
Household durable goods	5.5	3.9	3.6	4.6	4.5	3.7	3.3
Transport	14.9	13.6	14.3	16.4	15.6	14.3	14.9
Miscellaneous goods, services and other expenditure	20.5	25.4	28.2	29.0	32.2	31.3	33.6
Total	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**

Source: Household Budget Survey 2015-2016, Central Statistics Office, 2020.

While this has undoubtedly benefitted households in the short to medium term by allowing them to have more disposable income it is not sustainable. We cannot continue to reduce food prices while inflation and increased regulation increases the costs of production.

Downward pressure from lower retail prices is pressing down on the supply chain. The evidence of the impact of this is illustrated in the viability data above [See Figure 3]. Only 34% of farmers in Ireland are now viable and the vast majority of these are dairy farms. In the push to maintain margins all other parts of the supply chain are trying to reduce costs. We are forcing farmers to increase scale in order to remain viable. Increasing the scale of many Irish farms is not straightforward because of Ireland's varying topography, microclimates and soil types.

Europe is a high-cost economy in which to produce food. If proper margins are not attainable at farm level, farmers will be deterred from producing food and ultimately, left with no option other than to abandon their land. Across the EU, the level of food security which we enjoy is taken for granted. Policy makers must quickly wake up to this threat. Firstly, importing food from third countries would create further instability and uncertainty by reducing food security in those countries. Secondly, the EU's decision to export production to countries with inferior environmental standards is unfair. Irish farmers are producing food of the highest quality with a low environmental footprint. Our grass-based system is among the most sustainable in the world and as Ireland's largest indigenous sector provides employment to over 300,000 people directly and indirectly. The EU must level the playing field for primary producers selling output into the union.

Food-feed competition[21] should be highlighted in the info box on the role of animal-sourced foods in diet on page 36. Currently, Irish dairy farming is a net positive contributor to the global protein supply. For every 1 kg of human edible protein consumed by a dairy animal it produces 4.92 kg of human edible protein. In a world where the demand for nutrient rich food is increasing, Ireland is extremely suitable to producing protein in the form of meat and dairy from grass.

As we face a growing world population, we must ensure that all land available for agriculture is utilised. To do this we will need to maintain a strong population of farmers. Ireland still has very much a family farm model and if we are to protect this, we need to keep farmers on the land and attract new entrants by ensuring they can get a viable return from the market for their output. We must make it an absolute priority that a price premium is achieved for Irish produce that makes its way to the farmer/primary producer. In this regard the Office of the National Food Ombudsman/Regulator must be able to show margins along the chain and have authority to intervene if the primary producer is not being treated fairly.

National Food Ombudsman / Regulator

IFA note the use of a food systems approach in this strategy development project. To this end, it is absolutely imperative that a key objective of this strategy is to ensure an equitable share of profitability across the food value chain. It is understandable that this strategy will include an increased focus on sustainability. However, it is vital that farmers are not those who have to bear both the burden and associated cost related to sustainability. We need to ensure that farmers are fully rewarded for their efforts.

[21] Evaluating food-feed competition in Ireland's dairy sector, page 128, Moorepark Open Day Booklet 2019.

IFA welcome the recommendation to establish the National Food Ombudsman as well as the commitment to market and price transparency. IFA have long called for the implementation of a National Food Regulator with binding powers of enforcement. This is a priority as a fundament core principle underpinning this strategy. As provided for in the EU Directive, Member States can choose to go beyond the scope of the Directive. IFA has called on the Government to legislate to tackle other areas of unfairness by retailers, including: unsustainable discounting/below-cost selling by retailers, annual tendering by retailers, and misleading labels and fake brands marketed by retailers.

Impact and consequences of below cost selling:

- The inherent value of food is completely undermined. One has to ask what message it sends to consumers.
- Farm gate price has decreased by up to 20% on average over the past 5 years and IFA believes that below cost selling has contributed significantly to this. We are losing growers and as a consequence critical mass within each produce line.
- Promotions should be linked to when product is plentiful and agreed between the grower and the retailer. Traditionally this was the way it operated.
- On some lines, it's not possible to supply all Irish produce within the timeframe of the special which leads to supplementation with imported produce. Growers sell small volumes of product outside these promotions which creates troughs and peaks in demand which leaves the management of labour and associated costs impossible leading to increased expense because of unsocial hours. This can also lead to health and safety issues on farms.
- The closing of small shops and businesses due to the financial muscle of what are essentially large multinationals. Local growers who supply these small businesses are badly affected. Examples can be found in the South West of Ireland where there are only a few Central Distribution Centres.
- Below Cost selling encourages food waste.

Tendering as an UTP:

- Given the concentration of the grocery retail sector the use of tendering to secure contracts has been abused. As a result, we have only seen downwards pressure on wholesale prices of milk and other dairy products.
- A number of retailers have implemented tendering for fresh produce over different time frames i.e., 24-month, 18-month, 12-month and 6-month periods. We deem this to be an unfair trading practice as due to the nature of the fresh produce sector producers cannot predict the exact yield/quality of a crop at the time of planting and certainly not 6 months beforehand.
- For instance, many growers would submit prices to retailers in the Autumn Pre-Spring planting. Due to poor weather conditions these crops could be planted late and have yield and quality issues which could not have been predicted when tender prices were submitted the previous autumn. In the fresh produce sector, producers have to plan at least 5 years in advance for machinery and land leasing purposes. If retailers put their supply up for tender every year, then it is impossible to plan and/or make necessary investment decisions.
- The National Food Ombudsman must have the authority to scrutinise such tendering processes to ensure that farmers receive a fair price that is sufficient to sustain profitable enterprises.

Misleading labels and fake brands:

- The National Food Ombudsman must also have regulatory oversight on issues related to labelling. Indicators of provenance must be clear and not deliberately misleading. Equally, the creation of generic brands specifically designed to mimic established brands must be challenged.
- The creation of own brand goods has placed significant pressure on price. This is exacerbated by the decision of some larger multiples to only carry own brand goods for a wide range of products.
- Consumers should be afforded the choice between a range of brands in store and not just solely offered the own brand version.
- Regarding fresh produce, seasonality and provenance/sustainability standards should be taken into account when considering value. For instance, it makes no sense to sell fresh produce at a discount when it is scarce and programme promotions months in advance without knowing what the supply and demand dynamics will be at that time. However, if a glut suddenly occurs in a particular crop due to weather etc., accordingly some allowance should be considered in the price analysis to allow this crop to be sold temporarily at a significant discount to prevent food waste.

Listed below are other proposals put forward by the IFA regarding the National Food Ombudsman/Regulator or Equivalent Office:

- The recently published report by Grant Thornton to the Beef Task Force 'Independent examination of the price composition of the total value of the animal along the supply chain' identified the extent to which to the end consumer and clearly highlights the need for investigative and enforcement powers for 'The National Food Ombudsman/Regulator or Equivalent Office' to be provided in the primary legislation.
- detailed information is lacking in providing full transparency at all points in the supply chain from the farm The primary legislation must provide the National Food Ombudsman full investigative and enforcement powers for all aspects of the food production chain from farm to the end consumer which extends to all issues that impact on price.
- The primary legislation for the National Food Ombudsman must include the powers, resources and sanctions to ensure there is full transparency for all aspects of food production including issues that impact on production costs and behaviour of stakeholders that impact on the price the primary producer receives.
- The sanctions must be appropriate to act as a deterrent for stakeholders in the chain and the office must be resourced with a full inspectorate to enforce the legislation.
- Starting at the primary level the office must be in a position to quantify production costs on farms, investigate these costs, the factors that influence them including detailed and thorough analysis of all input prices and the factors that influence these.
- The purchasing practices of processors for farmer owned cattle, the use of own cattle and the influence this has on prices paid to farmers including the practice of importing live animals and meat.
- The value of the entire animal presented by farmers to processors must be quantified at all points in the chain from when it leaves the farm until it is purchased by the end consumer.

- The cost of the processing of the animal from presentation by the farmer until it reaches the end consumer must be established at all points in the chain.
- The office must be in a position to identify the margins of all actors in the chain and where it is found that the actions of some are impacting on the value that can/should be returned to the farmer it must be highlighted and appropriate legislative sanctions imposed on those found involved in this practice.
- The objective of the Primary Legislation must be to put in place the robust legal framework that provides full transparency for farmers and consumers of the margins throughout the food production, processing, distribution and retail chain.
- The office must regulate all unfair trading practices, and in turn deliver a viable price to farmers for their work and investment

As outlined earlier, it is vital that there is an equitable distribution of value across the food chain. It is clear that this can only be safeguarded by statutory regulations. Therefore, it is imperative that the National Food Ombudsman is given appropriate powers to regulate all parts of the supply chain.

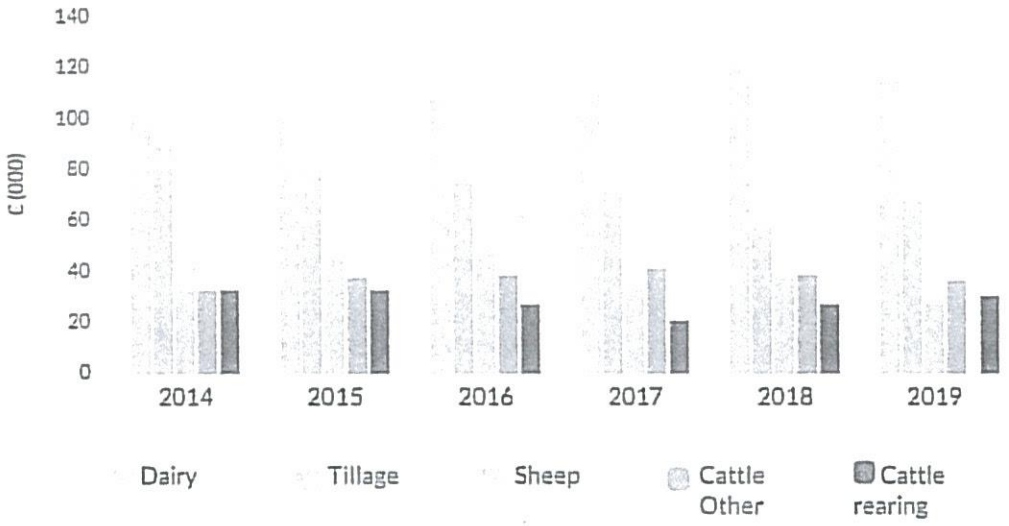
Dairy

The dairy sector's biggest challenge is a sustainable income that reflects the labour intensity of dairy farming, yet this is ignored in the paper when discussing the challenges faced by the sector. This is the main priority of dairy farmers. Dairy farming as a sector has the highest labour input and has the highest level of on-farm debt. Dairy farmers earn slightly below that of the average industrial wage.[22] While it is the most significant sector within agriculture, it still requires support to ensure its vibrancy.

When describing dairy farmers as a cohort, it is important to identify how indebted they are as a consequence of recent expansion which was necessary in order to derive a full-time income from the sector. Dairy farmers have borrowed heavily based on intended stocking rates, we cannot impose further stocking limits on them that remove their ability to make repayments and expose farms to significant financial stress. 64% of Dairy farms were recorded as having borrowings in 2019.

[22] https://www.ifa.ie/wp-content/uploads/2021/01/IFA-Dairy-Vulnerability-Assessment.pdf

Figure 13: Breakdown of Farms with Debt – Average € per farm 2014-2018



Source: Teagasc, National Farm Survey – Preliminary Results 2019

Figure 14: Percentage of Farms with Borrowings and Average Debt, 2019

Dairy	64%	€112,377
Cattle Rearing	31%	€26,627
Cattle Other	34%	€34,632
Sheep	26%	€25,907
Tillage	35%	€63,661
All	38%	€59,598

Source: Teagasc, National Farm Survey – Preliminary Results 2019

Expansion was and continues to be necessary to support a living wage, reducing our herd size is not possible unless higher retail prices are enforced on the consumer. Applying extra climate mitigation actions on farmers comes at a cost which must be reflected in the price paid to farmers.

There is little difference between animal welfare standards on intensive or extensive farms. In any event, what we describe as an 'intensive' farm in Ireland would not be so described in many other countries.

When discussing the opportunities and challenges for the dairy sector, the number of people directly employed by the sector and the multiplier effect of the sector on the rural economy must be included. Coming to the conclusion that an upward trend was seen in dairy prices is far-fetched, in another DAFM[23] document (Annual Review and Outlook) it clearly shows a different story where the agricultural output price for dairy has in fact declined by 4.9%.

[23] The Department of Agriculture, Food and the Marine

Figure 15: Agricultural Price Index – 2016 to 2019

Table 2.1 *Agricultural Price Index - 2016 to 2019*

Agricultural output price index	95.1	106.5	104.4	103.2	-1.2%
Crop output	106.1	104.1	119.6	131.8	10.2%
Cattle	93.0	94.7	93.4	88.1	-5.6%
Pigs	102.6	110.4	96.5	114.3	18.5%
Sheep	99.9	99.6	105.1	99.0	-5.8%
Poultry	99.5	99.2	99.5	100.4	0.9%
Milk	91.0	121.3	114.3	108.7	-4.9%
Agricultural input price index	97.9	98.2	102.7	105.0	2.2%
Seeds	98.5	98.5	98.2	106.8	8.8%
Energy	91.9	97.8	106.5	106.5	0.0%
Electricity	96.5	95.5	102.2	105.5	3.2%
Motor fuel	90.1	98.3	108.0	106.9	-1.0%
Fertilisers	86.2	81.5	86.4	90.9	5.2%
Veterinary expenses	101.9	102.1	105.3	107.5	2.1%
Feeding stuffs	100.0	100.6	107.2	110.4	3.0%

Source: Central Statistics Office, Agricultural Price Index

Source: Central Statistics Office, Agricultural Price Index

- To ensure adequate labour on farms, there needs to be a sustained provision of work permits for dairy farm labourers.

The paper needs to include more credit and data to demonstrate to the reader the efficiency gains of the dairy sector. In the last 10 years, the sector met all the targets of Foodwise, reduced its carbon footprint and provided employment during a recession amongst others. These achievements must be highlighted.

The sector needs a sex sorting laboratory in the country to optimise the use of this technology.

Currently the domestic demand for organic dairy is limited and the costs associated with its production exceed the premium associated with organic dairy. Until the demand and premium for organic dairy increases, the majority of farmers will not consider this as a potential production system.

Dairy farmers like other sectors will need financial supports to meet increased environmental targets that are suitable for intensive farms.

Tillage & Horticulture

More detail is needed on how these sectors will achieve the growth proposed in the strategy. Concrete goals, realistic timelines and funding strategies must be outlined. Countries such as Holland offer worthwhile case studies in which an evolution of production model transformed Holland into a net exporter from a net importer. The strategy cannot neglect these sectors and they must receive less attention than beef or dairy. Specifically, within the strategy document there are 208 actions listed, and just one of these is within the horticulture section. This does not seem like appropriate consideration, given the current importance of the sector, and the increasingly important role it is likely to play in helping Ireland achieve its 2030 targets. These sectors have a part to play in the development of a climate-neutral agri-food system by 2050, and the closer we need to get to climate-neutrality, the greater the need for carbon-sequestering land uses that also provide food. Targets need to be set in this section for the contribution

the tillage and horticulture can make to the 26.8m tonnes CO_2 eq. abatement through LULUCF highlighted on page 48.

Aquaculture

A sustainable Irish aquaculture industry has the potential to create employment opportunities and further enhance coastal communities both through direct employment and indirect employment in marine industries such as seafood processing, marine engineering and marine ancillary services. There is a need for commitment from Government to ensure the economic potential and sustainable future of the Irish Aquaculture industry is realised. The Irish Aquaculture sector needs the support of policy in order to achieve any realistic sustainable development so as to unlock any future potential of the Irish aquaculture industry. The Seafood Taskforce now provides an opportunity for Irish aquaculture to contribute to initiatives and developmental strategies to build a platform for meaningful development of a sustainable Irish Aquaculture industry and contribute to sustaining the Irish seafood industry post-Brexit.

Pigs & Poultry

There are a small number of pigmeat (circa 380) and poultry producers (circa 800), in a mainly intensive and commercially-driven sector. In terms of output, pigs contribute close to €1 billion annually and poultry output continues to grow at a rate of 4% annually to be approximately €500 million when taking both meat and eggs into consideration. Key challenges include improving animal health, continually improving productivity and competitiveness, and accessing and evaluating the environmental footprint of both sectors objectively.

Income Diversification

Just like in biological systems, diversity leads to resilience, and so too for a resilient food and agriculture system, diversity of production is needed. Horticulture receives very little mention in relation to income diversification. In a rapidly changing environment, to assume that the places within the EU that previously were the most suitable for producing certain foods, whether that be fruits or vegetables, or cereals or grass, is an assumption fraught with risk. In this context, the best means to solidify food security, at home and abroad, is to have diversified production in as many countries as possible.

Mission 3: Food which is Safe, Nutritious and Appealing, Trusted and Valued at Home and Abroad

There must be continued market research and trade missions led by DAFM in conjunction with Bord Bia to ensure Irish processor gain access to emerging high value markets across the globe, for pigmeat in particular.

Worldwide markets for poultry products are important for a whole bird carcass balance and need to be focused on as part of this strategy. Bord Bia could play a greater role in developing markets outside traditional markets in Hong Kong and South Africa which tend to be very volatile and inconsistent.

In relation to food safely, this strategy needs to set targets for DAFM to meet in relation to commitments on the national salmonellae programme for pigmeat. This has been in existence for 20 years with the situation still unsatisfactory from a farmer, processor and ultimately a food safety stance.

The positive work on the reduction of campylobacter in the poultry industry led by the Minister for Agriculture Food and the Marine through the Campylobacter Stakeholder Group must be continued.

Financial supports from DAFM to the poultry sector to co-finical the creation, administration and ongoing expense of poultry reserve funds to deal with disease pressures, is a priority for sustainability of Irish poultry farmers. This may take the form of producer group funds, and or specific sector funds created in conjunction with the IFA representing all-primary poultry farmers.

This strategy must ensure 100% compliance with all EU food labelling law. There is a shortfall in surveillance, partially at foodservice level that needs to be addressed as part of this strategy. This is an issue in imported pork and particularly with imported chicken meat, as Ireland is not self-sufficient in pork loins and chicken breast meat.

Mission 4: An Innovative, Competitive and Resilient Agri-Food Sector, Driven by Technology and Talent

Irish farmers have been at the cutting edge of innovation and adoption of the latest technologies for decades. This early adoption of key efficiency drivers in their respective sectors must be recognised in this strategy particularly when accessing the environmentally footprint of each sector.

IFA support the ongoing research into pig production conducted by Teagasc Pig Development Department and IFA are stakeholders on the research steering panel.

Teagasc plays an imprint role in the promotion and education of future mangers in the agri-food sector and this needs to be further supported financially through Government policies and within this strategy.

There is an increasing need for a dedicated Government funded programme, (within Teagasc) to develop, and implement a national strategy for the agri-food sector on education, skills and talent attraction and retention.

If you wish to discuss any aspect of this submission, please contact [redacted] IFA Farm Business Policy Executive by email or [redacted] or [redacted]

15th June, 2021

Ends.

Draft ID: 6a209e82-3096-45fe-ab99-19ac59bbe7be
Date: 15/06/2021 12:01:47

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:

Tim

* Surname

Cullinan

* Country

Ireland

* 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

Irish Farmers' Association

* 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

The core observation on the Agri-Food strategy to 2030 are included in the attached doc. In relation to the Environmental Report and Natura Impact Assessment it is critical that any future initiatives do not affect agricultural production or farming activity on Natura 2000 sites or other environmentally sensitive lands.

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

Please refer to attached document for in depth commentary on the Agri-Food Strategy to 2030.

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

Please refer to attached document for in depth commentary on the Agri-Food Strategy to 2030.

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

We note the in depth the environmental analysis which has been carried out in tandem with the Agri-Food Strategy to 2030. In our view, it is unacceptable that a full in depth full environmental impact assessment while no economic impact studies have been initiated.

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

5000 character(s) maximum

It is imperative that farmers are not restricted in the farming or agricultural activity they carry out as a result of any measures proposed under Agri-Food Strategy to 2030.

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

Please see document below.

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

http://www.friendsoftheirishenvironment.org

Dear Sir/Madam

Irish agriculture policy stands at a critical crossroads. We are in the midst a climate and biodiversity emergency as declared by Dáil Éireann. The Draft Agrifood Strategy to 2030 (AFS) is being prepared at a time when Ireland is about to legally commit to reduce national greenhouse gas emissions by 51% within a decade. The new CAP post-2020 is also currently being negotiated against the backdrop of the European Union Green New Deal, the Farm to Fork Strategy, Biodiversity Strategy and the European Union's commitments under the Paris Accord. Furthermore, the Nitrates Derogation will be reviewed in 2021 with no guarantee of its continuation. All of these issues which will all have a dramatic and profound impact on the future direction of Irish agriculture policy in the coming decade and beyond.

This is the third of a series of industry-led agricultural strategies which have been produced since 2011. Each of these previous strategies, although full of fine words in respect of environmental sustainability, has manifestly failed to reduce ecological degradation. In fact, the direct opposite is the case. Over the past ten years biodiversity and water quality have plummeted and greenhouse gas and ammonia emissions from agriculture have risen sharply. The evidence for this is unimpeachable. The EPA has repeatedly confirmed the growth of this sector has happened at the expense of our environment and that business-as-usual will not reverse these trends.

It is therefore extremely disappointing, albeit expected, to read what is, in effect, a business-as-usual Draft AFS again being proposed at this time. While the strategy claims that it is a new departure through proposing a, so called, 'Food Systems' approach, this is simply not credible given the increasing output growth projected for the sector and its environmental performance over the past decade. It is for this reason that the Environmental Pillar felt obliged to withdraw from the strategy committee due to it being woefully inadequate to meet the environmental obligations we face.

Friends of the Irish Environment is non-profit Company Limited by Guarantee and a Charity registered in Ireland. It is a member of the European Environmental Bureau and the Irish Environmental Network. Registered Office: Kilcatherine, Eyeries, Co Cork, Ireland. P75 CX53
Company No. 326985. Charities Registration No. 20154530 Revenue Charities Tax Exemption CHY 22294
Tel & Fax: 353 (0)27 74771 Email: admin@friendsoftheirishenvironment.org
Trustees / Directors: [redacted]

Friends of the Irish Environment (FIE) therefore submit it is wholly premature for the government to adopt a new 10-year strategy for the agricultural sector at this juncture. The sectoral carbon budgets, on foot of the forthcoming revised climate legislation, will be decided during 2021 on foot of independent advice from the Climate Action Committee. The draft strategy, with its proposal to reduce biogenic methane by a "minimum of 10% by 2030", therefore prejudices the outcome of the carbon budget process. Given that agriculture amounts to approximately 33% of total Irish greenhouse gas emissions, it is simply not tenable that a 51% reduction in national emissions can be achieved inside a decade without a very significant contribution from agriculture, and well in excess of the minimum 10% reduction proposed.

The draft strategy therefore must be withdrawn and reworked following the finalisation of the sectoral carbon budgets to match the budget allocated to the agriculture sector in tandem with the development of a new national Common Agriculture Policy (CAP) Strategic Plan to 2030. With so many major policy decisions affecting this sector still in flux, there is simply no justification whatsoever for a new strategy at this time. The only justification that can be deduced is that it is a deliberate attempt by agri-industry to prejudge these processes.

Strategic Environmental Assessment

This is the third 10-year strategies for agriculture since 2011, each of which was superseded five years early by a subsequent strategy. The current strategy, Foodwise 2025, is not due to expire for almost a further five years. According to the Environmental Report prepared pursuant to the Strategic Environmental Assessment (SEA) Directive 2001/42/EC12 by RSK Environmental Ltd. for the Draft AFS, as of end of 2019, only 27% of the policies included in the Food Wise 2025 are reported as having been achieved (Section 1.3). No proper justification whatsoever is provided as to why this strategy is now being abandoned and superseded.

In the first instance, it should be noted that there can be no question that the ER for the Draft AFS or formal SEA pursuant to the Directive is being undertaken and published 'voluntarily'. Formal SEA has been undertaken for each of the two previous agriculture strategies and used as a vehicle to legitimate those strategies. The 'Public Consultation on the Environmental Assessment of the Draft Agri-Food Strategy to 2030' has now commenced and it is clearly a 'plan or programme' for the purposes of the SEA Directive. To claim otherwise, as a technical means to diminish or to escape legal requirements, would be manifestly unjust and contrary to the EU Public Participation Directive and the Aarhus Convention.

Article 10 of the SEA Directive clearly sets out the requirements for the monitoring the significant environmental effects of the implementation of plans and programmes. This is to identify, at an early stage, any unforeseen adverse effects and to undertake the appropriate remedial action. Notwithstanding the fact that each of the Strategic Environmental Objectives included in the Environmental Report for Food Wise 2025 have clearly failed to be achieved, and in all

cases are diametrically trending in opposite direction, no formal annual monitoring has been undertaken or results published (as per Table 8.1 of the SEA for Food Wise 2025). There are a range of documents available on the Department's website but nothing which resembles formal, systematic annual monitoring of significant environmental effects. Likewise, no remedial action has been proposed.

It is simply not open to the government, in lieu of undertaking formal annual monitoring and remedial requirements, to simply withdraw each strategy five years early. The net effect of this is to circumvent the requirements of the SEA Directive to provide for a high level of protection to the environment (Article 1). This simply reinforces the perception and experience that the SEA is little more than a 'paper tiger' exercise with no real effect or intent and a cynical ploy to deflect environmental criticism through greenwashing.

The temporal scope (10-years) is part of the strategy and must be adhered to, just like all other elements of the strategy. It is of course open to the government to amend the current Food Wise 2025 strategy. In such case, it would be necessary to prepare formal monitoring reports and to specify the reasons why a formal amendment is necessary e.g. as a result of monitoring and the need to mitigate significant adverse effects. No such justification is provided. The Draft AFS is being proposed as an entirely new strategy to replace the current Food Wise 2025 strategy as confirmed in Section 5.4 of the SEA.

In effect, what is occurring is that every five years the slate is wiped clean i.e. a new baseline is presented. The SEA can then misrepresent the mitigation measures proposed as providing an improvement on the baseline. However, the reality is that it is the actual failure of the existing strategy to effectively implement the required mitigation measures and to undertake proper monitoring which is driving environmental degradation. This is unacceptable.

It is furthermore entirely unacceptable that public concerned are asked to contribute to a 10-year agriculture strategy only to have it abandoned and replaced five years early. This is contrary to the Public Participation Directive's requirement for effective public participation and for increasing the accountability and transparency of the decision-making process.

The persistent approach adopted by the government in supplanting successive agricultural strategies with new strategies significantly advance of their formal expiry is contrary to both the letter and spirit of the SEA Directive and likely to expose the State to legal action.

SEA Monitoring

Given the manifest failures to undertake adequate monitoring of the previous Food Wise 2025 strategy, it is submitted that monitoring measures proposed in Section 8 of the Environmental

Report for the Draft AFS are not adequate for the identification at an early stage of unforeseen adverse effects or appropriate remedial action.

It is simply stated that the High Level Implementation Committee (HLIC) will co-ordinate monitoring but without giving any details of how this monitoring will occur, who will do it, when it will be done, how the monitoring will be used and how any identified unforeseen adverse environmental effects will be addressed. As discussed above, the experience of the past is that this is simply not done.

Furthermore, many of what Table 8.1 identifies as indicators for monitoring significant environmental effects do not in fact measuring environmental effects at all. For example, in relation to Goal 2 (Restore and Enhance biodiversity), one of proposed monitoring measures and indicators is to, "Review annually the number of agriculture EIAs completed" (Action 7). This indicator is simply irrelevant in terms of monitoring the significant environmental effects of the implementation of the strategy.

There are numerous similar instances throughout Table 8.1 which are simply not fit for purpose, even if they were to be done. For example, in 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), one of the proposed monitoring measures and indicators is to, "Increase the overall amount of water bodies monitored". This is entirely circular and simply not an appropriate measure to monitor the significant environmental effects of the implementation of the strategy.

This entire monitoring framework as set out in Table 8.1 of the Environmental Report needs to be redrafted in order to be compliant with the SEA Directive.

Reasonable Alternatives

The SEA Directive requires that the, 'Reasonable Alternatives' are identified, described and evaluated taking into account the objectives and the geographical scope of the strategy (Article 5). Annex 1(h) of the SEA Directive stipulates that an outline of the reasons for selecting the alternatives must be provided. No such proper outline is provided in Section 5.3 of the Environmental Report. Instead, only a perfunctory description is provided. This omission compromises the legitimacy and transparency of the succeeding assessment of alternatives, and ultimately the justification of the Draft AFS.

In the first instance, it is noteworthy that the 'Base Case' (i.e. the 'Do Nothing' scenario) is the continuation of the Food Wise 2025 strategy. This is assessed in the Environmental Report as likely to have a strong adverse effect on the environment - the worst of the three alternatives assessed. This amounts to an explicit recognition and concession that current Irish agricultural policy has failed to protect the environment, despite constant assurances and elaborate,

contrived strategies to the contrary. As such, the criticisms from environmental non-governmental organisations of current agriculture policy are revealed as being entirely correct. In this context, cynicism towards the likely success of the Draft AFS are well founded.

It is abundantly evident from the Environmental Report that Alternative 2: 'Greater Emphasis on Reduced Output' is by far the best alternative for achieving Ireland's binding legal commitments in respect of greenhouse gas emissions, air quality, water quality and biodiversity. This alternative, however, is dismissed on the grounds that it, *"would negatively impact on large parts of the rural and coastal workforce, leading to increased economic hardship with potential implications for health and wellbeing"* (p.50). There is no evidence identified, described and evaluated whatsoever to reach this baldly stated conclusion which appears to be based on an entirely subjective opinion and a preferred predetermined outcome.

On the contrary, there is significant evidence that the expansionist policy approach towards Irish agriculture over the past decade has resulted in increased economic hardship with potential implications for health and wellbeing amongst farmers. For example, many farmers have taken on huge debt in a drive for expansion and there is evidence that stress, financial worries, major weather events and disease outbreaks all impact on farmers' mental health. Similarly, there is no evidence identified, described and evaluated presented as to the likely impact on climatic events on farmers' incomes or, for example, how an abrupt change of policy due to a forced compliance with EU environmental ceilings, as happened in The Netherlands (due to legal action), will effect farmers who have invested heavily in expansion. What happens to Irish agriculture if the Nitrates Derogation is not renewed? Furthermore, while some farmers have benefited from dairy expansion over the past decade, these benefits have been unevenly distributed with many farmers becoming worse off.

Similarly, there is no evidence evinced as to how an alternative approach to agricultural policy (Alternative 3), as set out in the EU Farm to Fork strategy, could have major economic, social and health benefits for farmers and rural communities in enhancing local employment and new long-term sustainable jobs through circular business models and bioeconomy, as well as the results of improving air, water and general environmental quality on human health. There is simply no evidence identified, described and evaluated that, *"Alternative 3 preforms worse in terms of the population and human health objectives"* (p.50). The entire analysis is beset with tacit precatalytic bias which points towards a preferred outcome with no impartial assessment based on evidence.

Furthermore, the chosen alternative (Alternative 3) is euphemistically entitled a 'Balanced Approach' while the alternative, which achieves the greatest environmental outcomes (Alternative 2), is framed negatively as 'Greater Emphasis on Reduced Output'[1]. In the context of the existential threat of climate change and biodiversity extinction, there is simply no justification for labelling Alternative 2 a 'Balanced Approach'. It is not 'balanced'. Despite symbolic language to the contrary, it is simply a continuation of the policies of Food Wise 2025 which has been specifically rejected in Alternative 1 (Base Case – Do Nothing) due to its adverse environmental outcomes.

The manner in which the alternatives are framed in the Environmental Report are not 'Reasonable Alternatives' for the purpose of the SEA Directive. The assessment is clearly biased to achieve a pre-determined outcome. There is considerable national case law and jurisprudence of the CJEU in respect of this matter. For 'Reasonable Alternatives' to be properly identified, described and evaluated, this exercise must be carried out with reverence to Annex I of the SEA Directive. Section 5.4 of the SEA fails to do this and reaches a conclusion wholly unsupported by evidence.

Ammonia Pollution

Ireland is under an explicit legal obligation under the National Emissions Ceilings Directive (NECD) to reduce ammonia emissions below prescribed ceilings (-1% by 2030 and -5% after 2030). Ammonia, 99% of which comes from agriculture nitrates pollution, is acknowledge to present the greatest challenge to Ireland's compliance with the NECD. Ireland has been in breach of the emissions ceilings since 2016. Ammonia is a noxious air pollutant with significant impacts for the human health of rural communities.

The revised *National Air Pollution Control Programme (NAPCP)* 'With Additional Measures' (WAM) scenario does not project that Ireland will achieve the required ceilings by 2030. A number of other measures as set in *'Ag-Climatise': A Roadmap towards Climate Neutrality'* (2020) are therefore proposed to bridge the gap but which are not included in the WAM scenario due to an absence of data. This Ag-Climatise document is replete with vague, untested and voluntary measures that can in no way be considered an appropriate basis upon which to base a trajectory towards legal compliance. This can only be achieved through a reduction in total nitrogen use.

In *Friends of the Irish Environment v The Government of Ireland & Ors [Appeal No: 205/19]* ('Climate Case Ireland'), the Supreme Court determined that the overriding requirement of a compliant plan in the context of the National Mitigation Plan for greenhouse gases is that it specifies how that objective is to be achieved. We respectfully submit that a similar situation arises in the context of the Draft AFS. While it is acknowledge that it is targeted to reduce ammonia emissions below 107,500 tonnes by 2030 to achieve compliance with legal ceilings, the level of specificity required such that it is sufficient to allow a reasonable and interested member of the public to know how the government of the day intends to meet the emissions ceilings is entirely absent.

Habitats Directive

The Natura Impact Statement (NIS) concludes that, subject to mitigation, that there will be no significant adverse effects upon the integrity of any Natura 2000 site. Similarly, at Table 8.1 of the SEA (Goal 2) it is stated that there are no adverse or uncertain effects identified by the SEA in respect of habitats. This is not credible.

The NIS for Food Wise 2025 provided a similar conclusion, which has transpired to be manifestly incorrect. The NPWS states that 85% of EU protected habitats in Ireland have bad or inadequate status with 70% of those impacted by agriculture, being ranked of high importance in more than 50% of habitats.

The mitigation measures included in the NIS and in Table 8.1 of the Environmental Report are simply not of a specificity or certainty required to reach a conclusion that there will be no significant adverse effects on designated European sites. The legal requirement to reach such a conclusion pursuant to Article 6(3) of the Habitats Directive is that it must include complete, precise and definitive findings capable of removing all reasonable scientific doubt which cannot have lacunae or gaps *(Kelly v An Bord Pleanála & anor. [2019] IEHC 84)*. Given the vague, aspirational and voluntary mitigation measures proposed, the NIS does not meet the legal threshold to reach such a conclusion.

Water Quality

Ireland has specific legal requirements pursuant to the Water Framework Directive to achieve 'good' status in all waters by 2027. The most recent data on water quality was provided by the EPA in the 2019 Water Quality Indicators Report, which highlighted that agricultural activities are the most significant source of pollution for Irish waters, with a direct impact on 53% of the water bodies monitored. The number of pristine water bodies has fallen to 20 from 500 since the 1980s.

At Table 8.1 of the Environmental Report (Goal 3) it is stated that there are no adverse or uncertain effects identified by the SEA in respect of water. This is not credible. The EPA has identified that 1,460 individual water bodies were identified as being at risk of not achieving their water quality objectives due to the damage being caused by significant pressures. Agriculture is identified as by far the most significant pressure.

Greenhouse Gases

Since 2011, methane emissions from agriculture have increased 15% and nitrous oxide emissions are up 18%. The EPA has modelled projected emissions from agriculture to 2030 and, under Scenario 3 (Stronger Growth in Agricultural Activity Levels), emissions are projected to stay stable or increase. Even taking into account the 'With Additional Measures (WAM)' scenario, agriculture emissions will only fall by 12.4%. In the context of a national target of a 51% reduction to 2030, this is woefully inadequate and inequitable. It simply shifts greater burden to other sectors of society where rapid emissions reductions are not readily achievable.

The Draft AFS proposes a 'biogenic methane reduction of a minimum of 10% by 2030'. Again, this minimum reduction is grossly inadequate. The achievement of this target is based on the Ag-Climatise roadmap which is replete with voluntary, vague and ill-defined measures which cannot be relied upon as a concrete strategy to achieve sustained emissions reductions. Furthermore, Ag-

Climatise proposes only to stabilise methane emissions, and is based on continuing dairy cattle herd increases to 1.65 million by 2027. In the absence of proposals to reduce total cattle numbers, the claimed emissions reductions from agriculture are both inadequate and not credible.

We would again remind the Department that in 'Climate Case Ireland', the Supreme Court ruled the government strategies and policies intended to achieve Ireland's legally enshrined climate change targets must include a level of specificity which is sufficient to allow a reasonable and interested member of the public to know how the government of the day intends to meet said targets. No such adequate specificity has been provided and the measures proposed are vague, aspirational and non-binding. It is simply impossible to know how the required emissions reductions will be achieved. The Teagasc MACC curve for greenhouse gas emissions assumes that all voluntary measures will be taken up and its acknowledged some elements require further research. The approach been taken is a classic example of attempting to technologize our way out of a problem to maintain business-as-usual when the solution is a change of policy.

For the reasons set out above, Friends of the Irish Environment submit that the Draft AFS is inadequate, legally problematic and premature and should be immediately withdrawn so that a new vision for Irish agriculture, which puts climate change, biodiversity and sustainable long-term incomes for our farmers at its core, can be developed in the context of the carbon budget allocated to the sector.

We have enclosed An Taisce's *'Submission to the Joint Oireachtas Committee Agriculture and Marine Meeting'* of the 4th May 2021 as a means of elaborating the issues raised in this submission. We also wish to associate this submission with all of the comments made by An Taisce at Table A2 of the Environmental Report.

Yours Sincerely,

[redacted]

Friends of the Irish Environment.

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