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Climate Change & Bioenergy Policy
Department of Agriculture, Food and the Marine
Pavillion A,
Grattan Business Centre,
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16th June 2020

Our Ref: SCP200802.2

Re. Draft Agri-Food Strategy 2030 and SEA Environmental Report

Dear [redacted]

We acknowledge your notice, dated 30th April 2021, in relation to the draft *Agri-Food to 2030* strategy (the 'Strategy') and its associated SEA Environmental Report. We welcome the opportunity to contribute at this stage of the preparation of the new Strategy.

The EPA is one of the statutory environmental authorities under the Strategic Environmental Assessment (SEA) Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of Strategic Environmental Assessments into Strategies and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to these Strategies. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.

This submission is comprised of four parts, *viz*, a cover letter addressing high-level review observations, and three detailed Appendices: with Appendix I providing specific comments on the Agri-Food strategy; Appendix II providing specific comments on the SEA Environmental Report and overall SEA-process; and Appendix III referencing chapters in the recent EPA State of Irelands Environment Report 2020 as considered relevant to the Strategy.

Introductory Comment

The observations in this submission should be taken as supplementary to those in previous communications from the EPA relating to the strategic priorities for the new strategy (July 2020), comments on the SEA scoping report (September 2020) and comments on the draft chapter "*A Climate Smart, Environmentally Sustainable Agri-Food Sector*" (February 2021).

As an overarching comment, the evidence shows that *Foodwise 2025's* guiding principle to embed 'environmental protection and economic competitiveness as equal and complementary' was not

successful: in recent years greenhouse gas and ammonia emissions have been increasing, and water quality and biodiversity declining, while at the same time the agricultural production has been increasing.

The EPA reiterates the headline issues that we highlighted in our letter to the DAFM in February 2021 with comments on the draft executive summary and the draft environment chapter, namely:

1) Environmental challenges are being underplayed, and,
2) The level of ambition presented is low.

We welcome that the published draft Strategy has incorporated many of our observations. However, it is our view, that the Strategy needs further strengthening in terms of communicating the message of the significance and urgency of the scale of environmental challenge that we face as a nation and indeed the role of agriculture therein. For example, the first reference to the negative trends in environmental impacts, attributable to agriculture in Ireland, is on page **47** of the draft report. The Strategy needs to acknowledge up front the role that agriculture has played in contributing to these negative environmental trends as a way of highlighting the scale of the challenge ahead.

Alignment with Plans & Programmes

The Department of Agriculture, Food and the Marine (DAFM) should ensure that the Strategy aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments. The Strategy should be consistent with the Climate Action Plan 2019 and forthcoming Climate Action Plan 2021. EPA analysis indicates that the proposed target for a 10% reduction in methane does not meet even the lower level of greenhouse gas emission reductions committed to in the Climate Action Plan 2019. This needs to be addressed. In addition, the Strategy must be consistent with the National Planning Framework (in particular National Policy Objectives 21, 22 and 25[1]), the River Basin Management Plan and the Regional Spatial and Economic Strategies. Although still in preparation, the new Strategy should clearly show how it will be aligned with the Common Agricultural Policy Strategic Plan 2023-2027 and its guiding European legislation.

Strategy Ambition

It is critical that the 2030 Strategy must match its level of ambition with tangible and challenging environmental emissions reduction targets (refer detail in Appendix 1) and should set out a clear pathway with timelines to show how these targets will be achieved. The Strategy must embrace new measures that go beyond improving efficiencies and focus on reducing total emissions by breaking the link between animal numbers, fertiliser use and deteriorating water quality.

The current model of subsidies or payments to farmers does not adequately support the addressing of environmental issues. It may be appropriate that direct payments be linked to land use/ land management activities that focus on co-benefits and ecosystem services, and that encourages increased ambition. This would protect farm incomes, provide environmental protection and also foster appropriate land uses.

[1] National Policy Objective 21 relates to supporting innovation in rural economies through the diversification of the rural economy into new sectors and services, including those addressing climate change and sustainability. National Policy Objective 22 relates to tourism development including the Peatlands Strategy. National Policy Objective 25 relates to DAFM investment in rural Ireland.

Implementation and Monitoring

In relation to monitoring the environmental performance of the Strategy, outcome-focused and activity-based metrics are required to allow for tracking of the sector's overall performance and accountability in improving sustainability and protecting the environment.

The monitoring should include measures to address new EU policy including the Farm to Fork Strategy, which sets ambitious but sustainable targets to '*transform the EU's food system*'. The *Agri-Food to 2030* Strategy must ensure Ireland has an agriculture and food sector that demonstrates validated performance around producing food in an environmentally sustainable way and acknowledge that transformative change will be required to deliver this.

State of the Environment Report – Ireland's Environment 2020 (SOER2020)[2]

In finalising the Plan and integrating the findings of the SEA into the Plan, the recommendations, key issues and challenges described in our SOER2020 should be considered, as relevant and appropriate. This should also be taken into account, in preparing the Strategy and associated SEA. Appendix III sets out the chapters which are particularly relevant to the development of the Strategy.

If you have any queries or need further information in relation to this submission, please contact [redacted] Office of Evidence and Assessment, directly. I would be grateful if you could send an email confirming receipt of this submission to: sea@epa.ie.

Yours Sincerely,

[redacted]

[redacted]

Office of Evidence and Assessment

[2] https://www.epa.ie/our-services/monitoring--assessment/assessment/irelands-environment/state-of-environment-report-/

APPENDIX I – SPECIFIC COMMENTS ON THE DRAFT AGRI-FOOD 2030 STRATEGY

GENERAL COMMENTS

The plan would benefit from the inclusion of a table of contents to assist in navigating the document.

In general, the document should include more detailed consideration of forestry related aspects. This should consider the restrictions experienced by the sector at present. The role of forestry in carbon sequestration and biodiversity enhancement warrant mention. In addition, the potential for negative effects on water quality, if forestry is not managed properly, should be highlighted along with relevant mitigation measures.

EXECUTIVE SUMMARY

The executive summary document would benefit from the inclusion of discussion on the following (some of which are referred to in the main document):

- Reducing the impacts of pesticide use in agriculture – This should be linked to the requirement in the EU Biodiversity Strategy for 2030 which includes specific measures for reducing the use of chemical pesticides in Agriculture (50% reduction by 2030);
- MCPA contamination of drinking water supplies;
- Reference to anti-microbials, anti-parasitics and genetically modified organisms should be included as these all have relevance, particularly for the aquaculture sector;
- Issues around land spreading of sludge and biosolids.

The Executive Summary, as well as the introductory chapter of the Strategy, would benefit from a schematic showing the hierarchy of agriculture and related environmental plans, European and national. It would be useful to show the relationship between the Agri-Food 2030 Strategy and the Common Agricultural Policy Strategic Plan and how they will work together towards achieving the targets specified in the Strategy. A schematic like this will show coherence between European and national plans and explain the policy context within which the Strategy is set.

The Strategy needs to acknowledge the role that agriculture has played in contributing to the negative trends in environmental impacts, attributable to agriculture, and should do so both in the executive summary and in the Introduction and Context.

MISSIONS, GOALS AND ACTIONS

Mission 1: Goal 1: Develop a climate neutral agri-food system so that by 2050, the climate impact of methane is reduced to zero and remaining agricultural emissions are balanced by removals; and improve air quality.

There is reference throughout the document to an absolute target value for ammonia. The NEC Directive for 2030 does not set absolute value targets. The targets are a percentage reduction on 2005 levels which, in the case of ammonia is a 5% reduction on 2005 emission levels.

As mentioned earlier, it is essential, that the Strategy is consistent with the Climate Action Plan 2019 and the forthcoming Climate Action Plan 2021. In particular, the base year to which the 10% reduction in biogenic methane applies needs to be specified and how this reduction links with the greenhouse gas emissions reduction committed to in the Climate Action Plan 2019. The EPA estimates that methane needs to be reduced 13-16% to be consistent with the lower level of ambition in the Climate Action Plan 2019 of 16.5 Mt greenhouse gas emission reductions. This is based on the EPAs ongoing work on the 2021 projections. Therefore, the committed reduction in

biogenic methane emissions in the Strategy does not meet the lower level committed to in the Climate Action Plan 2019.

In relation to the national herd size, the Strategy must be explicit on the environmental impact of the growing dairy herd and how this will be addressed to ensure a reversal of the negative environmental trends. The discussion around stable herd size hides the fact that the absolute increase in dairy cow numbers is having significant impact on the environment. The comment that "*the pace of increase has slowed*", does not address the fact that the dairy herd continues to grow.

In order to ensure the Strategy can deliver on addressing the associated environmental impacts such as playing a leading role in shaping how greenhouse gas emissions from livestock are understood and addressed, there needs to be a definitive approach and plan for direct and sustained engagement with farmers.

Mission 1 refers to an ambition to increase afforestation but does not specify a value that the agri-food sector could aim to achieve. Similarly, in relation to doubling the production of biomass, there is no definitive figure. In order to ensure that the impacts of the Strategy and the success of the Strategy can be measured, specific values for both of these should be included.

Mission 1: Goal 2: Restore and enhance biodiversity

We suggest considering factors related to the biomass and therefore, carbon stock of hedgerows be taken into account as part of hedgerow assessment for the baseline biodiversity studies. This will provide additional benefit in terms of quantifying the potential of hedgerows for carbon storage and sequestration.

The Agency understands that DAFM is investing significant resources into the use of remote sensing to assess land use/land cover and land management. This should be included in action 3 related to land use review. Significant resources are also being invested in land cover/ land use mapping by other organisations including the EPA. It is important that these valuable datasets are highlighted as being available to provide the necessary background to the land use review discussions.

The Teagasc GHG MACC and the Climate Action Plan 2019 highlight the proposed rewetting of or reduced management intensity of 40 kha of grasslands on organic soils. The message should be stated, under action 8, to highlight the benefits of rewetting or reduced management intensity of grasslands on organic soils.

The EPA submission in February 2020 (Mission 1, Goal 2, Action 7), referred to the low level of ambition to ensure that farms and forests do not contribute to habitat destruction and isolation. The current draft Strategy does not include further measures to address our concern. There is scope for the Strategy to require a form of environmental assessment, and/or achievement of environmental targets, for agriculture related activities. The assessments could be linked to funding or permitting systems. For example, to assist with achieving targets it may be appropriate that direct payments be linked to land use / land management activities that focus on co-benefits and ecosystem services, in areas where intensive agriculture is not viable. This would protect farm incomes, provide for environmental protection and also foster appropriate land uses. Such an assessment, or targets, would go beyond those that currently legally require environmental impact assessment for agriculture related activities. The detail of these assessments could be developed in the early stages of implementation of the Strategy in consultation with the agri-food sector.

DAFM have announced, under the Basic Payment Scheme, that water quality features/actions be eligible for inclusion in the scheme. Previously only lands within Priority Areas for Action in the River Basin Management Plan were eligible for inclusion. All areas of the country are not included. This should be extended country-wide under action 9 on protecting biodiversity.

Mission 1: 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.

The key impacts of farming on water quality are:

- Runoff of phosphorus and sediment from poorly draining soils into watercourses;
- Leaching of excess nitrogen through freely draining soils to groundwater and then to water courses;
- Chemicals such as pesticides and herbicides reaching watercourses and drinking water sources;
- Modifications to the physical aquatic habitat conditions in water courses, including sediment erosion, arising through land drainage, dredging of water courses and channelisation

In high status waters, which are often in upland areas, the key issues are the physical habitat modifications and sediment runoff from forestry and agriculture. These areas are also often underlain by organic soils. Farming on organic soils can pose a risk to water quality through losses of nutrients from fertilisers, and through discharges of ammonium when these soils are drained. There are, however, no measures included in the Strategy to address the problems arising from modifications to the physical habitat, or measures specific to the management of organic soils, both of which are particularly important in the catchments of high-status waters.

The Strategy includes measures to address nutrients and MCPA for drinking waters which are welcome. However, notwithstanding that, it would be beneficial if the wording of the MCPA action could be strengthened to bring a more proactive focus to the issue.

Mission 1: Goal 7: Strengthen and invest in Origin Green and other sustainability supports to reflect the higher level of ambition for the agri-food sector.

The ability of the sector to validate its performance is extremely important. It is key that the data is shared with key stakeholders. The action relating to metrics and evidence needs to be clear on how the collaboration between the relevant stakeholders will happen, who will drive the data sharing and how this will be made accessible and user friendly for the agri-food sector.

MONITORING AND IMPLEMENTATION FRAMEWORK

We welcome the inclusion of the chapter in the Strategy relating to monitoring and implementation. We note the reference to the establishment of a High-Level Implementation Committee (HLIC) to oversee the implementation of the Strategy and the proposed publication of an Agri-Food Strategy Implementation Plan alongside the Strategy. It would be useful for the implementation plan to refer to monitoring and implementation from Foodwise 2025, (e.g. learnings and information gaps) to address how this information can be applied to improve the new Strategy. This will set a clear pathway for the implementation and tracking of the Strategy in achieving its Missions and Goals.

The Strategy Implementation Plan should clearly set out the actions, targets, timeframes and the appropriate body or bodies responsible for implementation of the actions supporting the objectives/commitments in the Strategy. This will significantly strengthen the Strategy and reduce the risk of poor implementation. Given the broad range of stakeholders involved in implementation, it will be important that those bodies be consulted about the preparation of the Implementation

Plan. There is merit in considering the establishment also of individual focussed sector-specific sub-groups to oversee the Strategy and review progress on implementation of relevant sector measures.

The *Dialogue and Partnership* implementation section refers to engaging with children and students. The proposed working group should consider using existing mechanisms to engage with children and students including Green Schools, Macra na Feirme and Gaisce.

The Implementation Plan should include provisions for annual reporting on implementation of the Strategy commitments. It should also include links with the SEA-related monitoring obligations required under the SEA legislation. Thresholds should be agreed for the relevant topics to determine when remedial action would be required to be introduced.

The *Environmental Monitoring, Review and Reporting* should consider including actions to monitor the relevant aspects of the European Green Deal and the EU Biodiversity Strategy for 2030.

APPENDIX II – SPECIFIC COMMENTS ON THE SEA ENVIRONMENTAL REPORT AND OVERALL SEA PROCESS

GENERAL COMMENTS

The SEA environmental report clearly outlines the contents and main objectives of the Strategy. Many aspects of the baseline description outline the relationship to the agriculture sector. The SEA objectives/framework are also clear and the proposed monitoring is achievable.

There may be merit in publishing the scoping report alongside the environmental report and the Strategy on the DAFM website to enhance transparency and accessibility. The scoping report includes detailed information relating to the current state of the environment/sustainability and the likely evolution thereof without the implementation of the Strategy. The SEA environmental report should include the relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the Strategy, as is required under Schedule 2 of S.I. 435 of 2004, as amended (this baseline information on the current state of the environment was contained within the Scoping Report, but is not brought forward in sufficient detail in the Environmental Report).

The analysis of the existing environmental problems/pressures in the SEA environmental report briefly mentions agricultural pressures on sites of international nature conservation importance (SPAs/SACs) but does not describe these in any detail. This information is addressed in section 3.5.1 of the appropriate assessment and the information should also reflected in the SEA environmental report to clearly show any potential significant effects on European sites.

NON-TECHNICAL SUMMARY

Section 3 of the Non-Technical Summary describes the current state of the environment – its strengths, weaknesses, opportunities and threats in respect of the SEA topics. These could be better linked to agriculture, the agri-food industry and recognition of the environmental characteristics of particular areas likely to be significantly affected.

RELATIONSHIP WITH OTHER PLANS AND PROGRAMMES

We welcome the policy context for which the Strategy is being prepared as presented in Table 4.1. of the environmental report. It would be beneficial to include additional information on the plans/programmes with which the Strategy might have potential conflicts, such as the River Basin Management Plan or the National Biodiversity Action Plan, and the measures which would be put in place to address such conflict.

The links with the United Nations Sustainable Development Goals in the Strategy are welcome, however, they should also be referred to in the environmental report. DAFM should also ensure that the Strategy aligns with key relevant high-level plans and programmes including the CAP Strategic Plan and the National Planning Framework – Project Ireland 2040. The Strategy should also be consistent with the relevant objectives and policy commitments of the Climate Action Plan.

Both the SEA environmental report and the Strategy would benefit from the inclusion of a schematic showing the plan hierarchy for agriculture related plans, e.g. CAP Strategic Plan, Agri-Food, Ag-Climatise, as mentioned in our previous submissions. This would help identify areas which need closer coordination and integration as well as identifying synergies with other relevant Plans.

ASSESSMENT OF ALTERNATIVES

The scoping responses included as Appendix A to the environmental report include a range of proposals for the consideration of alternatives including reducing cattle numbers to 1998-2011 levels and setting environmental targets. The section of the environmental report on the consideration of alternatives should also capture the relevant suggestions regarding alternatives from the scoping responses.

The second alternative option presented in the environmental report relates to environmental sustainability. We note that this alternative has been rebranded since the scoping report from "*Greater emphasis on environmental sustainability*" to now in the environmental report as "*Greater emphasis on reduced output*". The aim of considering alternatives is to identify more environmentally friendly and more sustainable ways of achieving the objectives of the plan (which should themselves include sustainability). The rewording of the second alternative presents an already biased option indicating that it is linking environmental sustainability with reduced output for the agri-food sector. It is recommended this alternative is described as it is in the scoping report.

In addition, the Strategy would have benefited from the inclusion of alternatives around the individual missions or goals such as limiting total nitrogen inputs to the 2011 level and following a path continuing the 1998-2011 trends in nitrogen and cattle numbers, as proposed by An Taisce at the SEA scoping consultation stage.

ASSESSMENT OF ENVIRONMENTAL EFFECTS

DAFM should assess and document the full range of likely significant environmental effects of implementing the Strategy, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and projects. Table 6.1 of the environmental report would benefit from the inclusion of a legend to assist with the interpretation of the content of the table. The assessment of environmental effects presented in Table 6.1 should include consideration of the likelihood of an action being implemented or how the implementation of one action may interact with the implementation of another.

Section 4.4 Key Environmental and Sustainability Issues and Likely Future Trends, refers to information gaps for sub-regional information. It also identifies the information gaps relating to specific effects of previous strategies. The monitoring and implementation plan for the Strategy should address these information gaps to ensure availability of this information to inform future strategies and any remedial actions required during implementation. The environmental report should review the environmental monitoring from Foodwise 2025 and how it performs against the SEA objectives.

Despite the well documented impacts of agriculture on European sites, the environmental report does not specifically discuss problems related to agriculture and these sites. The assessment of environmental effects could be better linked with the section 3.5.1 of the Natura Impact Statement for the Strategy on potential impacts on Natura 2000 Sites from agriculture.

As a general comment in relation to the conclusions of the assessment of environmental effects, the SEA carried out for Foodwise 2025 identified positive impacts for biodiversity, water and natural capital. However, many of the actual impacts for Foodwise 2025 resulted in a negative impact on the environment. The environmental report for the Strategy concludes again that the impacts of the Strategy will be largely positive. The environmental report should address the negative impacts of Foodwise 2025 and what measures are included in the new Strategy to address this and provide assurances that the actual impacts from the Strategy will be positive as the SEA concludes.

TRANSBOUNDARY EFFECTS

It would be useful for section 6.6 Transboundary Effects to make reference to the transboundary consultation carried out at the scoping stage of the SEA and discuss any outcomes and how any information gleaned from the consultation has been incorporated into the environmental report.

MITIGATION MEASURES

Where DAFM have identified the potential for likely significant effects, appropriate mitigation measures to avoid or minimise these should be provided. DAFM should ensure that the Strategy includes clear commitments to implement the mitigation measures.

The environmental report includes mitigation measures which reflect a reasonable approach to improving the effectiveness of the various goals and actions identified. We welcome the inclusion of the cross sectoral mitigation and enhancement proposals. However, it is not clear how, or whether, the measures recommended have been incorporated into the Strategy. The mitigation measures recommended in the environmental report should be included in the Strategy, or an explanation as to why they have not been included should be provided. Likewise, the recommendations from the appropriate assessment should be integrated into the final Strategy. By integrating the recommendations from the respective environmental assessments, the Strategy will reflect the role and importance of the agri-food sector to be managed, and coordinated, in an environmentally sustainable manner.

MONITORING

The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities.

The Strategy proposes implementation, monitoring and reporting aligned with the environmental monitoring and reporting required under the SEA legislation. This will assist in evaluating the environmental performance of the Strategy.

The monitoring measures presented in the environmental report do not clearly relate to the environmental objectives of the Strategy. The monitoring should provide an indication of what remedial measures will be put in place should negative environmental trends be identified. The monitoring programme should ensure that it will monitor the progress in achievement of the Strategy's high-level targets relating to biogenic methane, ammonia emissions, agricultural nutrient losses to water, farmed areas prioritised for biodiversity, increased afforestation, increased marine protected areas, organic farming and food waste reductions.

Table 8.2, Additional Proposals, refers to monitoring of ammonia deposition at protected sites as an additional measure. Whilst this would be a useful indicator, it would be useful to also include assessment of habitat condition and to look for indicators of ammonia impacts on these habitats (e.g. presence or absence of certain plant species). It is important to directly measure impacts in order to understand the influence of the measured ammonia emissions rather than just the ammonia levels as an indirect indicator. The proposed target to '*Reduce ammonia emissions below 107,500 tonnes by 2030*' lacks a focus on environmental outcomes.

Because of the dominance of the agriculture sector as a source of ammonia, the opportunity to reduce ammonia deposition levels to below specified habitat 'critical loads' should also be considered as a target, in order to specifically protect these sensitive and protected habitats. Assessment of exceedances of habitat specific critical loads of nitrogen should also be employed as a monitoring metric.

Where the monitoring identifies adverse impacts during the implementation of the Strategy, DAFM should ensure that suitable and effective remedial action is taken.

Guidance on SEA-related monitoring is available on the EPA website at https://www.epa.ie/publications/monitoring--assessment/assessment/guidance-on-sea-statements-and-monitoring.php

FUTURE AMENDMENTS TO THE PLAN

DAFM should screen any future amendments to the Strategy for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the Strategy. This should apply to amendments to the Strategy on foot of the consultation process and prior to its finalisation.

ENVIRONMENTAL AUTHORITIES

Under the SEA Regulations, DAFM should consult with:

- Environmental Protection Agency;
- Minister for Housing, Local Government and Heritage;
- Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media;
- Minister for Environment, Climate and Communications; and
- Minister for Agriculture, Food and the Marine.

SEA STATEMENT – "INFORMATION ON THE DECISION"

Once the Plan is adopted, DAFM should prepare an SEA Statement that summarises:

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

DAFM should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.

Guidance on preparing SEA Statements is available on the EPA website at the following link: https://www.epa.ie/publications/monitoring--assessment/assessment/guidance-on-sea-statements-and-monitoring.php

APPENDIX III: KEY CHAPTERS OF IRELANDS ENVIRONMENT – AN INTEGRATED ASSESSMENT 2020

Chapter 13 of the SOER2020 relates to the Environment and Agriculture. The chapter addresses the level of pressure that Irish agriculture has on the environment in terms of greenhouse gases, water quality and biodiversity and highlights the risk posed to Irelands reputation as a food producer as a result.

Chapter 2 of the SOER2020 relates to Climate Change. This chapter clearly states the scale and pace of greenhouse gas emissions reductions must accelerate. Reducing emissions requires far-reaching transformative change across the whole economy, including in agriculture. Ireland's greenhouse gas emissions profile – with over one-third of emissions coming from agriculture – is particularly challenging. Ireland must also maximise the use of land as carbon stores, for example through grasslands, wetlands and forestry, to meet targets. These requirements must be balanced in the Strategy with a need to ensure a sustainable food production system.

Other chapters in the SOER2020 further address the pressures that agriculture places on the environment including air quality (Chapter 3), land and soil (Chapter 5), nature (Chapter 6), and water (Chapter 7).

These chapters should be consulted along with the related Key Messages prior to finalising the Strategy and the SEA process.

IRISH CATTLE AND SHEEP FARMERS' ASSOCIATION

ICSA Response to the draft Agri Food 2030 Strategy

June 2021

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Introduction

Overall, the positive element of the strategy is that it marks a move away from a singular focus on increased output and exports that was at the heart of previous agri-food strategies. This strategy is built around four missions and ICSA has been insistent that farm viability is at the centre of this so we welcome the fact that it is one of the four missions.

ICSA has consistently outlined the need to avoid at all costs an agrifood strategy which repeats the errors of previous strategies. The key issue is that the focus in recent strategies on expansion of exports has been at the expense of adequate concern for primary producer viability. This has been a particularly painful experience for the beef and sheep sectors as is adequately demonstrated by looking at successive Teagasc National Farm Surveys.

The next section will briefly look at the history of the livestock sector in Ireland as a way of placing the ICSA view in context.

The Backdrop

Irish agriculture has long had a symbiotic relationship with the UK market. Before joining the EEC in 1973, Irish farming was extremely dependent on exports to the UK. In fact, the need to export to the UK can be traced back as far as the 19th century and in the early years of the state, the economic war in the 1930s demonstrated our dependence and vulnerability to being focused on one market.

Throughout the 1950s and 1960s, cattle exports to the UK were the main driver of farming strategies, such as they were at the time. Nonetheless, while there was volatility in this dependence, there were also opportunities for progressive cattle farmers, albeit in the context of a low cost, economically weak country. In the early 1960s, the establishment of Bord Bainne and the creation of the Kerrygold label was a decisive step change for the dairy sector. The fact that no such innovation occurred at that time in the beef sector still reverberates today and perhaps defines the massive gap in the fortunes of dairy and beef even in the 21st century.

For the first 25 years of EU membership (EEC, EC and then EU) the early optimism was replaced by the difficulty in finding markets for products that were constantly in surplus. Milk quotas were the solution in 1983 for the dairy sector but whereas they provided stability for some producers across the EU-15, they also gradually strangled the lifeblood out of the sector and were particularly deleterious for Ireland.

There were different solutions for beef. Intervention and private storage helped dampen volatility but exports outside of the EU were the main strategy to keep the sector alive. This was helped considerably by export refunds and a strong live export trade particularly to North Africa. By the late 1990s, the Egyptian market was one of the most important markets for Irish beef.

However, the sale of beef to markets such as North Africa and infamously to Iraq, was not without its problems. Pressure for change in EU policies, especially the demand by GATT (later WTO) for an end to market distorting subsidies meant that the export refund model was on its way out.

This was the background to the McKinsey report in the late 1990s which proposed that we had too many small scale processors and it advocated rationalisation at processor level. The processing sector then moved to put in place a targeted buy-out scheme which was known as BIDS (Beef Industry

Development Society). This ended up in a protracted legal battle between the Competition Authority and the BIDS promoters from 2003 to 2011 with the result that the European Court of Justice (ECJ) essentially stopped the process, by declaring it incompatible with EU competition law.

However, although the BIDS process never got off the ground, increasing demands by regulatory authorities for ever-increasing standards of facilities for processing has resulted in the loss of many abattoirs at a local level. Moreover, the cut-throat nature of competition has led to many casualties in beef processing throughout the past twenty years while seeing the emergence of a number of dominant players.

We now have two companies with turnovers well in excess of €2 billion. These are ABP and Dawn. Both have been allowed to expand further with the acquisition of Slaney/ICM and Dunbia respectively and this has been sanctioned by EU Competition Authorities. Both companies also have a dominant presence in the UK and ABP has operations in Poland and Dawn has a significant interest in Elivia, the second largest beef processor in France. Only Kepak come anywhere near in terms of scale.

For many years now, farmers have been frustrated at the apparent lack of competition for their product. The market for Irish cattle can be described by the economic term, oligopsony (a state of the market in which only a small number of buyers dominate). Although there appears to be competition from other processors, these companies are reliant on co-operation with the big two.

However, among the primary producers there exists a state of perfect competition (many sellers, none with any power to negotiate price). Farmers have long expressed frustration that processors do not try to negotiate better prices to their retail customers or develop marketing strategies based on value added because they are content to drive down price paid to their vulnerable suppliers.

A report produced by Harvard professors Mary Shelman and David Bell for Bord Bia in 2010 identified Irish processors undercutting each other in various EU markets as a problem which was doing neither processor nor primary producer any favours. Their solution was to propose co-opetition and the development of an umbrella brand, with a specific mantra of "we are natural and we can prove it. Come see us, we are open for business." This became incorporated in the Food Harvest 2020 Strategy.

However, processors did not implement the idea of an umbrella brand. Nor did they demonstrate much interest in innovation to deliver higher value to the end user. Although beef export values increased, the primary means of this has been through increased volume, essentially a consequence of dairy expansion.

Bord Bia has to a considerable degree, been left with the task of innovation and insofar as Origin Green can be described as a brand, has been the vehicle for the umbrella brand.

None of this has delivered for farmers. Beef prices in 2021, although marginally better than 2020, are nowhere near breakeven price, and this is going to get worse in the context of rapidly escalating costs in feed, fertiliser, fuel and materials.

ICSA believes that the lesson is that the future of Irish beef and lamb farming will not be helped by more of the same. Unfortunately, globalisation has increasingly led to markets being concentrated in the hands of one or two major players with increased movement of capital away from smaller actors in the chain.

ICSA suggests that the consequence of this for any future strategy is that advocating increased output by farmers is exactly the wrong policy. We therefore welcome the more nuanced approach outlined by the concept of food systems and the focus on four missions or pillars, albeit with key caveats.

ICSA wants to see further emphasis on fair play for farmers in the food chain. ICSA is strongly advocating for regulation of the food chain at EU and national level and argues that there must be full transparency around who makes what from the food chain. In particular, the dominant companies should not be allowed to hide behind complex company structures where financial results are concealed.

The strategy should make reference to the need to strengthen the office of the established Food Ombudsman, in light of the current deliberations on this.

The strategy should explicitly support more competition for livestock. In particular, new entrants to beef or lamb processing should be actively encouraged and supported through planning and all incentives available to those investing in export businesses.

The strategy should propose that the government actively supports groups of farmers who want to brand their own beef and that this is built in to the PGI and suckler beef brands.

The strategy should support ownership of the suckler and PGI brands remaining under the control of beef farmers. It is clear that previous strategies around branding have not led to benefits for farmers and this can now only be delivered through a model in which the interests of the primary producer are protected.

VUCA

VUCA is an acronym for Volatility, Uncertainty, Complexity and Ambiguity and it is used in business strategy. It reflects the fact that we live in a world where all the best laid plans can be laid to waste by the unexpected.

Shortly after the FoodWise strategy was launched, the Brexit vote happened and Donald Trump was elected. Very few predicted this. Today, we are in the midst of a global pandemic in which many of the responses implemented by governments would have been seen as impossible a few years ago. The consequence of prolonged closure of food service has been severe on Irish livestock products but nobody would have thought of it as a possibility two years ago.

ICSA submits that the Agrifood 2030 strategy should be more cognisant of the reality that the future is unknowable. Businesses need to be more nimble to cope with not only volatility but totally catastrophic events.

It isn't just about future shocks; it is also about examining what changes will emerge as a permanent consequence of the adaptations forced upon societies and economies. What are the implications for work practices? What are the implications for how people consume food and what will it mean for retail? Should Irish food companies think about the opportunities that have been opened up by retail being relocated from the shopping mall or high street to the front door of the working from home population? Will the selling of products now involve more time dealing with Amazon than with Tesco or Sainsburys?

Or is there a lesson for farmers borrowing very large amounts of money to tie themselves for many years to a dairy farming enterprise which cannot easily be sold or adapted?

The strategy should have something to say about VUCA.

MISSION 1:

A CLIMATE SMART, ENVIRONMENTALLY SUSTAINABLE AGRI-FOOD SECTOR

Farmers are primarily in the business of producing food at very tight margins. The reality is that farmers need to be properly supported if they are to incur the opportunity cost of farming in line with the ambitious targets set out. The current GLAS and the pilot REAP scheme deliver a level of payment which is not remotely commensurate with the demand for a net zero strategy or indeed the various other biodiversity indicators.

There are many other examples of where government policy and action fails to match the ideals of the strategy (and the Climate Action Bill) such as the ongoing failure to implement a programme for growing the renewable gas and solar energy sectors. Equally, there has been endless prevarication around the use of biofuels in transport. All of these renewable technologies could be win/ win in terms of new income streams for farmers and significant de-carbonisation in the energy sectors.

ICSA recognises that Ireland has obligations to meet targets for emission reductions but the strategy must also emphasise the need to avoid carbon leakage. If this strategy is to have any credibility, the government will have to make a choice between its free trade advocacy and the inherent contradiction of Mercosur being implemented while Irish farming is restricted.

ICSA supports the strategy in putting emphasis on the sequestration delivered by farmers through hedgerow and tree management but in particular, through Irish grassland and tillage farming practices. It is essential that accounting for sequestration is solved sooner rather than later and that farmers are given the credit for carbon sinks.

ICSA wants the strategy to confirm that Ireland will actively pursue a climate policy at EU and IPCC/ COP level that balances emissions with sequestration.

ICSA wants the strategy to be more explicit in emphasising that Ireland should protect its vital national interests in terms of agriculture's unique contribution to our emissions profile. It is simply not feasible to make agriculture a substantially smaller proportion of national emissions because we don't have industrial or coal sectors such as Germany has. It is absurd that this is a disadvantage to our agriculture compared to Germany's.

ICSA wants stronger emphasis on the importance of the suckler and sheep sectors, acknowledgement that their well-being is critical to our overall climate change picture while at the same time being crucial for rural communities especially where farm structure or land type makes dairying unfeasible. The strategy must also emphasise that continuation of sucklers and sheep is actually reducing overall emissions and that agri-environment schemes should be targeted at these sectors, as well as at tillage.

ICSA believes more research needs to be done before we accept that finishing at younger age reduces emissions – this may be true on a kg of output basis but not on a national total emissions basis. More intensive finishing leads to increased output rather than more trees and will incur additional imported input costs – feed, fertiliser, and fuel. Therefore we think the strategy should have some caveats about finishing cattle at younger ages.

The strategy should propose that Ireland immediately implements policies that deliver a workable model for biogas which benefits farmers. We recommend that the Gas Networks Ireland plan for 20% renewable gas should be actively considered by Government and this should be an urgent priority.

It should explicitly suggest that solar panels on roof sheds are supported under microgeneration policy, and not just for own consumption but for export to the grid.

Ireland should implement E10 fuel mixes immediately to support biofuels.

ICSA does not agree with covering all slurry storage by 2027. In particular, there should be exemptions for older, smaller scale slurry pits built before 2000. However, dairy farmers with substantial outdoor cubicles and large lagoons should be given a realistic time frame to phase this out.

ICSA also suggests that the national herd size must be largely left to voluntary decisions. However, we suggest that eco-scheme payments should not be readily available to derogation dairy farmers and that TAMS grants and other incentives should not be available for dairy herds in excess of 200 cows. CAP supports should not be used to grow large scale dairy herds – if a farmer wants to milk 1,000 cows, the dairy processors should fund this through milk price.

In terms of the size of the national herd, ICSA categorically opposes any enforced reduction in cattle or sheep numbers, particularly the suckler herd. National inventories of cattle should be reduced by increasing live exports of calves and weanlings and store cattle.

There may be some scope to reduce livestock numbers on a voluntary basis where a farmer is given a proper incentive for smaller scale, hardwood. The strategy should propose that plantations of oak, beech, alder etc are offered forestry premia for at least thirty years or else there is little prospect of much planting of hardwoods. Whereas farmers will be reluctant to plant large areas, it would be very feasible with the right subsidies to encourage many farmers to plant 2-10 acres, especially in small clusters. But the current regime falls totally short of what is required.

There is little sign that the level of ambition across the four missions is matched by government and EU policy, or by the agrifood industry at processor and retailer level. At policy level, it is exemplified by the fact that the REAP pilot agri-environment scheme will be worth about €4000 to farmers, which is not dissimilar to GLAS whereas twenty years ago REPS was seen as a scheme that really rewarded participating farmers. ICSA wants the strategy to call out the need for meaningful schemes that deliver up to €15,000 for participants.

The ambition to make Ireland a world leader in the highest standards of sustainability will be a waste of time unless the meat industry can demonstrate what premium this will deliver. For too long, the meat industry has expected farmers to be happy when it reaches the average EU price; if the sustainability objective means anything, we cannot expect farmers to deliver unless they get significantly more than the EU average.

ICSA is also concerned that the report has not been more focused on making suckler farming a central part of our strategy in producing sustainable beef for a premium price. On the contrary, we are concerned that it has not made it clear that reduced emissions are in the first instance, the responsibility of the dairy sector. Suckler beef produces a lot less emissions per hectare than intensive dairying, and it is the total emissions across all Irish hectares that determines Ireland's goals in reaching climate change targets.

ICSA does not want to see Quality Assurance as desirable for all farmers; if everyone is in it, then nobody benefits from it because farmer bargaining power to get a bonus is removed.

MISSION 2:

VIABLE AND RESILIENT PRIMARY PRODUCERS WITH ENHANCED WELL-BEING

This cannot happen unless the food processing sector commits itself to developing a partnership of equals with the primary producer. This means commitment to full transparency in the food chain, particularly in relation to share of margin and a commitment that initiatives which are dependent on actions at primary producer level are developed on the basis that the benefits are substantially returned to the primary producer.

For example, added value through a grass fed label or PGI is rightly the added value delivered by the primary producer rather than the processor and therefore the processor is entitled to some marketing costs and commission but it can only work on the basis that at least 85% of the value added is returned to the primary producer.

Goal 1

ICSA notes that the importance of suckler farming and smaller scale, more extensive cattle and sheep farms is acknowledged. This must be reflected in the new CAP. In relative terms, the CAP has become less supportive of the cattle, suckler and sheep sectors in recent iterations with dairy farming increasing its take, particularly in the context of Pillar 1 (where the average per hectare BPS payment is higher on dairy farms than suckler and sheep farms according to the 2019 Teagasc National Farm Survey) and also in terms of TAMS supports.

The focus on increased competitiveness and productivity should be subject to the caveat that such improvements should not come at the expense of the primary producer. In particular, the trend towards large scale dairying needs more critical analysis on a holistic basis. Are dairy farmers better off in the long-run taking into account the need for massive capital expenditure? What is the impact on quality of life and how sustainable is it from a health perspective, especially given labour constraints in the Irish economy?

What are the impacts on the beef sector of more calves of poor conformation being put into the system by dairy expansion?

What are the impacts on the tillage sector of increased land rental prices due to dairy expansion and what is the knock-on effect to suckler farms in availability of straw? Should the strategy emphasise that greater use of home grown cereals and especially protein crops should be an integral part of a food systems approach, both in the context of climate change goals and retaining earnings in the Irish rural economy?

Goal 2

ICSA fundamentally opposes any proposal that "all farms" will be in a Quality Assurance Scheme (action 32). This cannot work for primary producers- the purpose of a QAS is to incentivise participation by delivering a better return from the marketplace. If all farmers are in the scheme, then there is no control to verify the value of participation. Unless participation is voluntary, there will be no incentive for processors to pass back a better return to the primary producer. **This is a red-line issue for ICSA.**

The UTP directive is an important first step. But the strategy must be clear that additional regulatory powers for the Ombudsman office are essential, particularly in relation to food chain price transparency.

Farmers must remain in control of the PGI grass fed and suckler brands.

The Department shall actively assist producer groups or farmer owned co-ops to apply for PGI or similar designations in the future, regardless of the grass fed PGI.

MISSION 3:

SUPPLY FOOD WHICH IS SAFE, NUTRITIOUS AND APPEALING; TRUSTED AND VALUED AT HOME AND ABROAD

This section must emphasise that payment of a better price to the primary producer must be front and centre to all actions under this mission.

The processing sector must commit to investing in building the reputation of the product and this should be done in collaboration with the primary producer. For example, it is necessary to examine how much should be spent by processors in combating the anti-meat propaganda and the need for a marketing campaign to counteract the go vegan campaigns.

ICSA wants the strategy to be clear that meat and dairy is nutritious food. This is critical in terms of developments at EU level such as the Farm to Fork strategy. Ireland must insist that any developments on labelling are not biased against meat and dairy products. We are concerned about the "Nutri-Score" which must not be used to drive a plant based agenda. Ireland must also actively oppose suggestions that EU promotion funding would be withdrawn from livestock products.

ICSA wants to see live exports included in market development initiatives. Farmers cannot support an agrifood strategy unless it is clear and unequivocal in supporting live exports regardless of the external environment.

Suggested edits to Mission 3 highlighted in green.

Given its export orientation and with a supply of rich, high quality primary produce from land and sea, food and drink companies are a critical element of Ireland's economy and some have developed into global leaders in their field. However, they operate in competitive markets and for this reason, the need for in-depth consumer insight, and the creation of value added through innovation and product differentiation, is hugely important, particularly in the context of returning a better price to the primary producer.

Goal 1

Actions (see also actions for Goal 3):

1. **Improve coherence of policies for food, health and nutrition through the establishment of a high-level implementation group co-chaired by the Departments of Health and Agriculture, Food and the Marine.** This should act as a starting point for the development by Government of a National Food and Health Policy. There is already a substantial agenda where the work of both Departments overlap, including aspects of Healthy Ireland and the National Obesity Strategy. These various initiatives should be advanced through effective citizen engagement and informed by scientific evidence and expert advice and input from stakeholders representing all aspects of the food and health systems. From this process, clear guidance on sustainable healthy diets that is science and evidence-based should be published for different audiences

2. **Ensure that the healthy and sustainable choice is made as accessible to consumers as possible.** Great efforts in this regard have been made in recent years and these should be intensified. Food processors, food service operators and retailers influence consumers' dietary choices through the types and nutritional composition of the food they produce and sell, their choice of suppliers, production methods (including primary production systems) and packaging, transport, merchandising and marketing practices. Nutritious foods should also be affordable and acceptable from a sensory (flavor and texture) and cultural perspective to consumers.
3. **Promote best practice on labelling.** Farm to Fork includes ambitious proposals for harmonised mandatory labelling; including front of pack nutrition labelling; as well as enhanced origin labelling; and a sustainable food labelling framework. Ireland should contribute positively towards this workstream, having due regard to its predominantly livestock based agricultural system, and ensuring that labelling initiatives contribute to greater consumer awareness and knowledge, without creating unintended barriers to trade. The EU Nutri-Score proposals under the Farm to Fork strategy must not be allowed to denigrate meat and dairy products, and Ireland should insist that all research outlining the positive health impacts of grass-fed are fully integrated into any EU labelling. Bord Bía should also follow this approach in relation to standard for voluntary labels which as the Q-mark and grass-fed logo. Successful pilot projects testing blockchain technology to enhance traceability across supply chains has been carried out by BIM. It is intended to incorporate this in future seafood sustainable assurance initiatives. Blockchain and other digital technologies offer significant potential for the whole agri-food sector.
4. **Agree a stakeholder Roadmap for Food Product Reformulation.** Self-regulation has been the primary approach to product reformulation in the Irish food industry, where good progress has been made in recent years.
5. **Develop public procurement policies to promote healthy and sustainable diets,** which include meat and dairy products, particularly in schools and public institutions.
6. **Continue to invest in the food, health and diet/consumption systems research required to generate the evidence base to inform our national policies.**

Goal 2

- Enforce robust food safety and authenticity measures, at all points along the food chain, to maintain trust and to prevent damage to the system through a lack of confidence.

- Develop focused, factual and clear messages for trade customers and consumers, including the promotion of more direct contact with producers, around food safety, how food is produced, how it is processed, sustainable food and healthy diets. Funding should be allocated to primary producers who undertake initiatives, either individually or on a collaborative basis, to better inform consumers of their farming systems, their animal welfare priorities and their efforts to improve biodiversity and other environmental metrics.

Goal 3

Further develop on Bord Bia's 'Thinking House' model of targeting product and market segments based on consumer and market insights, while leveraging regulatory expertise to ensure new products and innovations are compliant with relevant legislation. The ability to utilise foresight into market and consumer behaviour should also continue to be developed. Retailers and brand suppliers also have an insight into consumer trends, attitudes and behaviours, and with the growing amount of data collected in this area, there is an opportunity to leverage this through the supply chain. Efforts should also be made to improve the transmission of market insights to primary producers, as part of a move to greater transparency in the food chain.

Goal 4

- **Intensify the programme of Ministerial trade missions to priority international markets** including live export markets.
- **Enhance the presence of DAFM and Bord Bia in those markets where a need is identified.** The placing of such resources should also be responsive to market developments. These efforts should be effectively coordinated with other Government Departments and agencies, particularly Enterprise Ireland, to maximise the benefits for Ireland's trade agenda and food and drink exports. Live exports should be seen as an integral part of this work.
- **Carry out an update on the 2018 'Prioritising Markets: Opportunities for Growth' exercise in 2022 in conjunction with industry stakeholders.** Farmers should be part of this process and the emphasis should be on which markets deliver best returns to the primary producer.

MISSION 4:

AN INNOVATIVE, COMPETITIVE & RESILIENT AGRI-FOOD SECTOR, DRIVEN BY TECHNOLOGY AND TALENT

Whereas constant innovation and the relentless quest for competitive advantage is the hallmark of any successful business model, this must not be a pretext to drive prices ever lower to the primary producer but, as is the norm in successful businesses, a means to delivering better revenues which in turn reflect the need to pay workers and suppliers a worthwhile wage and return on capital employed.

ICSA wants acknowledgement that farmers have invested a lot in every available technology and the strategy cannot go any further in terms of being the cheapest producer of food. Instead, the focus of innovation needs to be creating better customer value propositions which can deliver better returns to farmers. For example, could value be added to cheaper cuts of beef as a protein and iron food?

Goal 2

ICSA notes that the level of R&D spend as a proportion of turnover is particularly low in the meat sector at 0.4% and this compares poorly with the dairy and beverage sector at 0.7%

We support the target that R& D should reach 1%. However, state support for increased R&D must be done in consultation with the primary producer. Second, R&D initiatives which move the sector towards developing niche high value products, developed by individual businesses rather than one umbrella strategy should be preferred. This is vital to ensure that the future trajectory does not compromise the need for competition between processors, and that such competition should be oriented towards getting a better return from the marketplace.

In this regard, ICSA believes that the majority of such funding should be allocated to smaller scale processors (eg turnover of less than €200 million per annum). It is notable that in dairying, several of the smaller West Cork co-ops have consistently out-performed the larger co-ops and PLCs in milk price, and this is linked to their product portfolio. Similarly, we want to see state support only directed at initiatives that will direct a better return to farmers and we believe that this must re-balance the threat to primary producers caused by increased consolidation within the processing sector.

Farmers have not been served well by the dominance of two players in meat processing and developments in recent years have exasperated this.

ICSA also wants to see state support for R&D directed at new enterprises and entrants into the sector. The strategy must be absolutely clear that more competition for cattle and sheep is an essential element of returning viability to many farms. There can be no ambiguity around the national policy and there should be no repeat of the unfortunate events in relation to Chinese (or any other) investment in the Banagher project.

Every effort should be made to retain the remaining small scale independent abattoirs and processing facilities. While food safety is paramount, the standard of premises required should also be practical and in line with other EU member states. The focus where standards of facilities are not appropriate should be grant aid to meet the standards in a reasonable time frame and not closure.

Goal 5

In tandem with the arrangement of competitively priced finance, such as the Future Growth Scheme, there should be a concerted effort to improve risk assessment and financial analysis of large scale on-

farm investments. Current low interest rates have the potential to lead to a complacency around repayment capacity. Also, cheap finance can lead to decisions that are not justified in terms of return on investment and farmers need to be fully conversant with all aspects of analysing a large-scale, long-term investment before going ahead.

Expansion plans need to be sensitivity tested in terms of future product price scenarios and interest rate changes to take account of a wide vista of volatility.

It is also essential that farm investment plans must have a coherent plan for labour to take account of labour scarcity, rising labour costs and what-if scenarios if the farmer were to become incapacitated for short, medium or long-term durations.

The availability of finance should not be exclusively directed at dairy farming or more specifically at dairy farm expansion plans. Tillage farmers often have access to machinery hire purchase or leasing, which is relatively straight forward and financed on the machine, thereby reducing the overall risk to the farm business. However, there is an ongoing need for more modest finance for cattle and sheep farmers

Response to Draft Agri-Food Strategy to 2030

Climate Change and Bioenergy Policy Division,
Department of Agriculture, Food, and the Marine,
Pavilion A, Grattan Business Park,
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Portlaoise,
Co Laois, R32 K857.

To whom it may concern,

Many thanks for the opportunity to respond to the documents that were published. As the representative of the Horticulture Industry Forum that made a submission to the original consultation in October 2019, it is good to see the outcome of that process coming to fruition now.

HIF comments on the Agri-Food 2030 strategy

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

General comments about the strategy:

- Page 35 it is stated.....*Furthermore it recognises that different regions of the world have climates (temperatures, rainfall etc.) and soils which are more suitable for certain types of agriculture, for example pasture fed livestock, tillage, or horticulture, and therefore that international trade is of importance in ensuring universal availability of both staples and nutrient-rich foods....*

We feel that this statement does not represent the modern reality of the technology available for horticulture production anywhere. In the context of horticulture development, Ireland has not adopted technologies at scale, which mitigate soil type and climate and brings production closer to consumption. Horticulture production warrants much more consideration because climate change is affecting the traditional so-called suitable climates for fruit and vegetable production. We feel the thinking around the development of the horticulture sector needs to shift beyond being viewed through the lens of land use and diversification opportunities for farmers. A risk assessment of traditional international suppliers of fruit and vegetables points to increasingly challenging production environments where clean water and extremes of weather pose risks.

Internationally, smart horticulture production is undergoing a renaissance in terms of technology adoption in the production environment but also demand for plant-based nutrition and a new appreciation for plants and landscapes is driving massive growth. In Ireland's case, this demand has unfortunately only led to increased imports as we are unable to leverage that demand due to resource constraints in the innovation capacity of the sector in Ireland. Technology, automation, and controlled environment agriculture (CEA) are centre stage in most developed horticultural innovation systems. Horticulture technology exist already for sustainable food production but have not been adopted in any large context in Ireland. The following graphic depicts Ireland as having the

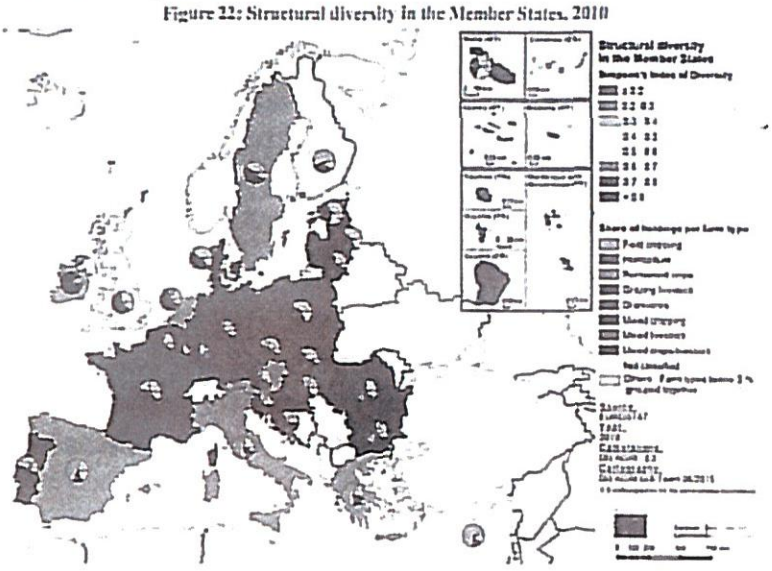
lowest farm type diversity in all of Europe. This strategy needs to address this question thoroughly. There is a lack of pertinent horticulture sector information in this strategy, nor is there detail on opportunities that exist for the development of horticulture in Ireland.

https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/farming/documents/farm-structures_en.pdf

Structural diversity of farming

- Structural diversity is here described as the distribution of agricultural holdings across different farm types in a given area, measured by Simpson's Index of Diversity[4]. When all holdings in a given region specialise in the same farming activity, there is no diversity and the index value is "0". On the other hand, a perfect distribution of holdings across all farm types is shown by the index value of 1.
- The analysis of the index at Member State level gives a snapshot of the structural diversity of agricultural activities in the EU in 2010 (the year of the last agricultural census).
- Croatia, Romania and Bulgaria show the greatest degree of structural diversity with index values above 0.8. In these countries, farms are well distributed across several farm types.
- Relative high values of Simpson's Index can be also observed in a group of 8 countries (France, Germany, Belgium, the Czech Republic, Slovakia, Hungary, Poland and Slovenia), where agriculture represents a rich variety of activities: in France for example, 35% of the holdings produce grazing livestock, 26% field cropping, 18% permanent crops and 8.4% mixed crops/livestock; the other farm types (horticulture, granivores, mixed cropping and mixed livestock) are also represented and together account for 12% of all holdings.
- A less diverse structure of agriculture holdings exists in Italy, Spain and Greece, where permanent crops form the dominant farm type with a share of around 50% or more in all holdings.
- Ireland has the lowest degree of farm type diversity, with 87% of all holdings specialised in grazing livestock. In the United Kingdom and Luxembourg, more than 60% of all holdings specialise in grazing livestock, while in Cyprus and Finland the same rate of concentration applies to permanent crops and field cropping, respectively.

Figure 22: Structural diversity in the Member States, 2010



[4] Simpson's Index of Diversity determines the degree of concentration when individuals are classified into types.

- Regarding the section on Food, Nutrition and Health, and Box 2: The role of animal sourced food in diets on page 36.

We think that it is important to provide scientific evidence when speaking about the health benefits of food. It is also important to be balanced. The idea that fresh produce, wholefoods, and plant-based ingredients have not been included in the context of Nutrition and health is surprising if you take the WHO position and the food Pyramid into account as you suggest you do? If there is to be a box 2 in defence of meat, there should be a box 3, which promotes the superior health attributes of fresh produce.

- Page 79. Key target: Increased tillage, horticulture, organic and Agri-forestry production.

The strategy does not give any detail how it will action this target. Primary producer performance in the horticulture sector is not measured by NFS.

- Page 91-92, regarding organics and areas in deficit, horticulture, tillage, and dairy are mentioned,

By way of action, it is stated....., *In addition, Teagasc should establish organic grassland demonstration and tillage farms and conduct a competitiveness analysis of Irish organic farming.*

Why is horticulture not included in this action?

- **Mission 2 - Viable and Resilient Primary Producers with Enhanced Wellbeing**

. As a general observation, given the opportunity for horticulture in general within the document. In high level target number two, (Viable and Resilient Primary Producers with Enhanced Wellbeing), horticulture does receive prominent mention: "Increased tillage, horticulture, organic and Agri-forestry production". However, when the horticulture element is addressed on page 85.

it is basically the same lacklustre strategy that has been applied over the past thirty years: That of import substitution, producer organisations and a few other key words that are all too familiar at this stage.

Given that this has not been phenomenally successful in the past, one would have hoped that a renewed vision might have emerged in this strategy. It is disappointing that there is a promise to "develop a strategy", but no timeline, no goals, no milestones to reach the non-existent goals. Understandably, there are many actions listed for the dairy sector (10 in total), beef and sheep sectors (9), pig-meat and poultry sectors (6), and tillage (5), but just one for horticulture.

In our submission we speak of what New Zealand and Holland have achieved over the last 15 years, were they were once a net importer of Horticulture Produce to now a world leader in exporting Horticulture Produce to replace import substitution. We should look at the New Zealand and Dutch model.

HIF believes that the key to improving the viability of farms, fishing businesses and agri-food businesses is to ensure that sufficient margin is earned by the primary producer, who in turn delivers (and is certified when delivering) high standards of production that renew the soils, protect biodiversity and minimise GHG and maintain air quality.

The imbalance of commercial leverage where producers continue to be in a weak position to bargain for a fair price with a few dominant retail multiples must be addressed.

HIF recognises that another key driver for improving economic viability for horticulture is the establishment of an equitable and effective industry funding mechanism (levy) to help promote fresh produce.

In summary, the Horticulture Industry Forum would like to see greater emphasis on horticulture within the 2030 strategy, and the potential contribution of horticulture acknowledged within all the appropriate headings of missions and goals. We wish to see some concrete goals and timelines, rather than one unsatisfactory action within the entire strategy. 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 in size i.e., fourth largest

agriculture sector in Ireland, and the increasingly important role it is likely to play in helping Ireland achieve its 2030 targets.

Thank you.

[redacted]

[redacted]dustry Forum

[redacted]

Sustainable Water Network (SWAN)

Environmental Assessment of the Draft Agri-Food Strategy to 2030

- Response to Public Consultation -

Sustainable Water Network
SWAN

June 2021

Sustainable Water Network (SWAN)

9 Upper Mount Street,

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1. Introduction

The Sustainable Water Network (SWAN) welcomes the opportunity to respond to the Public Consultation on the Environmental Assessment of the Draft Agri-Food Strategy[1] to 2030. SWAN is an umbrella network of 25 of Ireland's leading environmental NGOs, national and regional, working together to protect and enhance Ireland's aquatic resources through coordinated participation in the implementation of the Water Framework Directive (WFD), Floods Directive, Marine Strategy Framework Directive (MFSD) and other water-related policy and legislation.[2]

Please note that due to capacity issues SWAN is not in a position to comment on the Natura Impact Statement (NIS) nor on the marine aspects of the draft Strategy. We refer you to the submissions of our members An Taisce, the Irish Wildlife Trust and Birdwatch Ireland for expert input on these areas.

Please find our response and recommendations set out below.

1. SWAN published the report ***'Towards a New Agricultural and Food Policy for Ireland Recommendations for Government'*** jointly with the Environmental Pillar and Stop Climate Chaos in April. In this we set out comprehensively our recommendations for an environmentally sustainable agri-food strategy that is demonstrably aligned with Ireland's obligations under environmental law and that works within the ecological parameters essential to a healthy society, economy and planet. We now submit this report in full as part of our response to this consultation as Appendix I.

   RECOMMENDATION 1:

   - Recommendations in the above and appended report to be considered and reflected in the final Agri-Food Strategy.

2. **SWAN** notes that we were **excluded from the development of the AgriFood Strategy**, despite a track record of work on the interactions between agriculture and water quality/WFD status and despite requesting a seat on the Agri-Food Strategy Committee via the Environmental Pillar representative. Nonetheless, we did contribute, albeit indirectly through the verbal and written inputs from the Environmental Pillar rep. We note that the majority of the recommendations and concerns in relation to water in the draft Strategy expressed by the Environmental Pillar rep. remain outstanding.

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[1] Hereafter referred to as the 'draft Strategy'

[2] SWAN has been actively engaged in WFD and other water policy implementation at both national and River Basin District (RBD) level since 2004, responding to water-related public consultations and representing the environmental sector on the Irish Water Stakeholder Forum and the National Water Forum.

RECOMMENDATION 2:

- All outstanding recommendations from this process, in particular those set out in the Environmental Pillar submission *"Agri-Food Strategy 2030: Submission on Chapter 10 'A Climate Smart, Environmentally Sustainable Agri-Food Sector'"* be addressed in the final AFS.

3. **Public engagement and dialogue in Agri-Food Strategy development:** SWAN believes that the future of food production and land use in Ireland is a matter of utmost significance to all of civil society and the wider public in Ireland, and not just to the agriculture and agri-food sectors. It is linked to the food we eat; the nature of our rural landscape and environment; the viability and sustainability of rural Ireland and also to the food we market abroad and our resulting international reputation. It is also linked to water pollution (and associated public health risks), a matter of increasing public concern as outdoor activities and water-based recreation become more popular.

   It is our position that the engagement and consultation process of the AFS was inequitable and flawed because it did not facilitate either wider public participation or balanced stakeholder engagement and was deeply skewed to represent the sectors with the most commercially vested in the Strategy. This lack of inclusivity was demonstrated by the unbalanced membership of the Agri-Food Strategy Committee, the majority of whom represented agriculture and agri-food interest groups. A transition to a truly sustainable agricultural system will not be possible without investment in meaningful public engagement and equitable multi-stakeholder dialogue.

   Aside from considerations of wider societal engagement, even the limited public consultation on the Strategy has been confusing and inadequate:

   1. It was unclear as to whether the consultation was on the Environment Report or the Strategy itself or both. This confusion led to a number of queries to the SWAN office from network members.
   2. The consultation material was inaccessible and excessively lengthy: It comprised more than 400 pages in three documents, two of which were technical in nature (the Strategic Environmental Assessment Environmental Report and the Appropriate Assessment Natura Impact Statement).
   3. Little attempt was made to explain the material or make it accessible to the general public.
   4. Given the amount and nature of the documentation, the consultation timeframe was inadequate.

   In light of the above, we strongly refute the contention in the foreword that the two month consultation constituted *"a genuine national conversation"*.

It is further our position that this approach is not in compliance with either the SEA directive which requires that *"the public.. shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report"*, nor with the Aarhus Convention which provides that *"Each Party shall make appropriate practical and/or other provisions for the public to participate during the preparation of plans and programmes relating to the environment, within a transparent and fair framework, having provided the necessary information to the public."*

RECOMMENDATION 3:

- Withdraw the current Strategy and initiate a comprehensive and innovative nationwide public engagement programme to facilitate inclusive dialogue and participation for an alternative model for agriculture in Ireland. This process should be designed by public engagement professionals and employ a range of methodologies including a national citizens' forum, and regional and local workshops and meetings, surveys, interviews and focus groups. Given that the current strategy (FoodWise 2025) runs for another 4 years until 2025 we do not believe there is an urgency to finalise the draft strategy to 2030. It is far more important to develop an inclusive strategy that builds trust and has buy-in from all sectors of the Irish public.[3]

4. SWAN welcomes the acknowledgement of the *"..urgent need to address the negative environmental impacts associated with dairy expansion"* and notes the increased emphasis on environmental sustainability in the language used and aspirations expressed in the Agri-Food Strategy. However, it lacks specific detail on how the Strategy has been integrated with existing EU environmental legislation and specifically **legal obligations on water under the Nitrates Directive and WFD**. Nor does it set out how the agriculture sector plans to reverse the link between agriculture and breaches in these laws. Given that livestock agriculture in particular has been linked to declines and breaches in all these areas it is not acceptable that the draft Strategy:

- still proposes that *"the core of Ireland's agri-food output should continue to be grass-based livestock production"*, while not including a commitment to reduce the number of livestock (to acknowledge the link between increasing herd size with infractions)
- Does not include a commitment to reduce the herd, relying only upon a non-committal reference to AgClimatise as follows, *"AgClimatise makes clear that an increase in the national cattle herd above current levels will*

[3]SWAN is cognisant of the fact that it is unlikely that the draft Strategy will be withdrawn. We therefore submit all recommendations following Recommendation 3, either to the longer term process of developing an inclusive Strategy, which we are calling for, or we submit them as recommendations to the current draft, in the event that this Strategy proceeds.

jeopardise the achievement of the sector attaining climate neutrality by 2050. Therefore it is proposed that under the auspices of the 2030 process, detailed plans to manage the sustainable environmental footprint of the dairy and the beef sectors will be produced by Q2 2022."

- Includes the commitment that the *"policy of supplying an increasingly diversified range of export markets and developing new high value markets will continue."* without demonstrating how this will be done without compromising the water (and wider) environment.

RECOMMENDATION 4

- A revised and re-developed Strategy should include a clear commitment to transition away from the ongoing dominance of intensive livestock farming, to reducing the number of livestock nationally and set out clearly how it will align with the Nitrates Directive and the Water Framework Directive

5. We welcome the target of reducing *"nutrient losses to water by 50% by 2030"* in the line with the **EU Green Deal**. However, this appears to be an unsubstantiated aspiration since there is **no clear information** in the Strategy **as to how** this challenging **nutrient target will be achieved** / implemented. There are sub-targets underneath this key target e.g. *"annual chemical nitrogen use not to exceed 325,000 tonnes by 2030"* and the actions under Goal 3 (e.g. a-f under Action 2.) but there is no indication given as to how, and the degree to which, these will contribute to achieving the 50% nutrient loss reduction target. No specific programme to implement this target and to monitor and assess progress is put forward. SWAN does not believe that it is acceptable to say (pg. 139) that *"a detailed Implementation Plan with the actions and their owners, deliverables and timeline for implementation will be published separately when the final Strategy is published"* because this implementation is critical to the environmental sustainability or otherwise of the Strategy and detail of this is necessary to facilitate an informed response to the consultation.

Furthermore it is regrettable that the associated commitment from the EU Green Deal regarding **pesticides** is omitted and that only a non-committal general statement as follows is included: *"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 and in particular, the objective of reducing pesticide use by 50% by 2030."* This falls short of the concrete commitment needed to address agricultural pesticide pollution, in particular of sensitive high status waters and also of drinking water sources.

RECOMMENDATION 5

- Present a re-drafted Strategy that clearly sets out a credible roadmap for how the nutrient loss target will be achieved.

RECOMMENDATION 6

- Include a target for reduction of pesticides in line with the EU Green Deal.

6. **Mission 2 Goal 1** *('Improve competitiveness and productivity of primary producers")* **poses a significant risk to continuing or increasing current levels of agricultural water pollution.** The SEA Environment Report does not adequately identify or address this. While Table 6.2 (pg. 101) states that *"Actions to promote the sub-sectors in order to grow and develop new markets could have adverse effects if this leads to intensification."*, it then goes on to say that *"..there are likely to be beneficial effects from Action 3 and 14 which requires that detailed plans are produced to manage the environmental footprints of the dairy* [and beef] *sub-sectors which includes for making a positive contribution to water quality."* Actions 3 (pg. 81 of draft Strategy) is to *"produce a detailed plan by Q2 2022 to manage the sustainable environmental footprint of the dairy sector"*

This is a crucial point in terms of protecting the water environment from a planned Strategy to continue with current levels of livestock farming. SWAN believes that what is proposed is wholly inadequate. Firstly, the use of the word 'sustainable' here suggests that the environmental footprint is already sustainable. This is demonstrably not the case, given that dairy farming has been linked to water quality declines. What is required is rather a full and comprehensive assessment of the current impact of bovine livestock farming, taking into account catchment and sub-catchment-scale factors, and then detailed, evidence-based proposed actions to bring the dairy (and beef) sector into line with basic legal requirements under environmental legislation. For water that is the Nitrates Directive, the WFD (and the Habitats Directive for aquatic and water-dependent habitats and species).

Secondly, it is too late to begin this assessment in Q2 of 2022 if the Strategy is to be finalised in Q2 this year.

RECOMMENDATION 7

- Incorporate this assessment of current and projected agricultural practises and livestock levels, along with proposed actions to address these, into a re-cast Strategy.

7. **Mission 1 Goal 3 – Water** should not focus on high status sites alone but also on restoration of all waterbodies impacted by agriculture and classified as at risk from agriculture by the EPA.

RECOMMENDATION 8

- The title of the Mission 1, Goal 3 should be changed to include the restoration of all waterbodies impacted by agriculture and classified as at risk from agriculture by the EPA.

8. **Integration:** Given the impacts and interactions with water and nature, there needs to be far better integration in the governance and implementation of the Strategy. Specifically in relation to water, it must be better integrated and aligned with River Basin Management Plan (RBMP). There must be far more collaboration with agencies that have a leading role in the River Basin Management Plan, such as the DHLGH, the Environmental Protection Agency (EPA) and the Local Authorities Water Programme (LAWPRO). This is also needed in order to make the claims of a *"whole of government approach"* in the draft Strategy a reality.

RECOMMENDATION 9

- The Steering Group for the re-developed Strategy should include a wide range of government agencies and departments including those charged with river basin management planning and nature protection.

9. **Implementation and Oversight:** The sustainability claims in the draft Strategy lack credibility unless there is a clear implementation plan set out with accountability, deliverables and timelines. While the draft Strategy proposes the publication of a separate document *"with actions and their owners, deliverables and timeline for implementation"* following publication of the final Strategy, this is not appropriate and results in unfounded aspirations and claims that are not accompanied by underpinning evidence of how / whether these will be delivered.

While SWAN agrees with the proposal that *"an environmental sub-group should be established to oversee monitoring, review and reporting of environmental issues"* we believe this should be run by an independent agency.

RECOMMENDATION 10

- In the re-developed Strategy, include a full suite of 'SMART' objectives with a full implementation plan and roadmap.

RECOMMENDATION 11

- A separate environmental monitoring group should be established, which includes independent scientists and academic experts.

10. **Origin Green:** SWAN believes that Origin Green should be discontinued as we do not believe it is based on clear evidence /metrics of environmental protection. In fact the draft Strategy itself acknowledges that *"The metrics and evidence base Origin Green need to be improved"*. We further believe that it is presents a misleading image of Irish agriculture, which will ultimately undermine our environmental credentials internationally.

RECOMMENDATION 12

- Discontinue Origin Green. However if it is continued, include clear criteria for water quality. Currently it only has a metric for water use / quantity.

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APPENDIX I:

Joint report by SWAN, the Environmental Pillar and Stop Climate Chaos ***'Towards a New Agricultural and Food Policy for Ireland Recommendations for Government'***.

Please see accompanying document. Also available at the following link:

https://www.swanireland.ie/wp-content/uploads/2021/05/Towards-a-New-Agricultural-and-Food-Production-Policy-for-Ireland.pdf