

Department of Agriculture, Food and Marine
Kildare Street
Dublin 2

8th January 2015

Re: 2025 Agri-Food 2025 Strategy Consultation

Dear Sir/Madam,

Thank you for the opportunity to set out the EPA's views in relation to the proposed 2025 Agri-Food consultation. The EPA made submissions in relation to the environmental analysis for Harvest 2020 (available at the following [link](#) on our web-site) and has also contributed to the Harvest 2020 High Level group. Please refer also to these earlier submissions.

Overall, the EPA remains broadly supportive of the aims and vision of Food Harvest 2020 provided that it does not result in negative impacts for the environment at national, regional or local levels. Damage to the environment will damage the image and credibility on which Food Harvest 2020 is built and growing agriculture without damaging the environment upon which it depends is a significant challenge.

The EPA understands that the 2025 Agri-Food Strategy will be subject to an Environmental Analysis and the EPA will make submissions at the appropriate stages of the process which will build on this preliminary submission and our earlier submissions referred to above. The three main issues as we currently see them can be summarised as follows:

1. Harvest 2020/2025 has the potential to put the quality of our environment at significant risk:

While the projected growth in animal numbers is relatively modest, there are very significant risks to the environment associated with increasing animal numbers and associated increases in food processing. These risks are to water quality, air quality, soil quality, biodiversity and climate. They are driven by:

- Increases in the quantities of slurry (from cattle, pigs and poultry),
- Increased greenhouse gas emissions,
- Increased nutrient inputs,
- Increased effluent volume from increased food processing.

Local and regional variation is also a very significant issue in Ireland and a significant constraint for Food Harvest 2020/2025. Some areas are more suitable than others for intensification and more vulnerable areas need careful protection, for example:

- Vulnerable groundwater and drinking water sources,
- Vulnerable rivers, lakes and estuaries,
- Vulnerable habitats.

The EPA can help identify vulnerable areas to assist with the targeting of both intensification and environmental protection measures.

2. We need a strong evidence base to prove that green means green in Harvest 2020/2025:

A strong, reliable and independent evidence base is needed to demonstrate and communicate the impact of Food Harvest 2020/2025 on the environment. This is essential to both prove that Food Harvest 2020 is not damaging the environment (if this is the case), to report and track actual impacts both positive and negative and to protect the overall brand image of Harvest 2020/2025. To quote the vision for Food Harvest 2020: *'this green image must be refined, be substantiated by scientific evidence, and communicated effectively over the coming decade if Ireland's commitment to sustainability and the implementation of world-class environmental practices is to become the platform for export growth. Ultimately, through the development of the 'Brand Ireland' concept, consumers in key markets will learn to recognise implicitly that, by buying Irish, they are choosing to value and respect the natural environment'*. The entire project is fundamentally built on the premise that it is good for the environment so it is crucial that the project is planned and implemented in such a way that this becomes a reality and that it can be proven to be a reality.

A strong evidence base is needed in particular to underpin assertions that food production in Ireland is at the cutting edge of sustainability and more work is needed to build this evidence base. It is also important that a robust system is put in place by the Department of Agriculture to track and monitor the performance of the Rural Development Programme including GLAS to provide evidence that the programme is delivering real and quantifiable environmental benefits. This, in turn, will support Harvest 2020 and the proposed 2025 Agri-Food Strategy.

The EPA will base its own independent judgements on the scientific evidence available to it; a key indicator for the EPA will be Ireland's compliance with national and international commitments including water, air, climate and biodiversity.

3. Innovation and technology can play a key role in development sustainable agriculture in Ireland.

There are very real opportunities for innovation and technology to help with the development of cutting-edge sustainable agriculture in Ireland. However, given the scale of agricultural production, Ireland has lagged behind other countries in adopting technologies like anaerobic digestion which have the potential to turn animal waste into a more valuable and stable resource.

The Rural Development Programme should also be used to support the overall aim and vision of Food Harvest 2020/2025 by targeting resources at areas which will give greatest environmental protection return and by encouraging innovative and, preferably, low-cost solutions to common problems.

Thank you for providing the EPA with the opportunity to comment at this early stage of the process. We look forward to working with the Department of Agriculture, Food and Marine to help build sustainable agriculture and food production in Ireland.

Yours sincerely,

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