

Department of Agriculture, Food and Marine
Agriculture House
Dublin 2

Friday 18th October, 2019

Submission on Proposed Strategy for the Irish Agri-Food Sector to 2030

Dear Sir/Madam

We welcome the opportunity to make a submission on the proposed Strategy for the Agri-Food sector to 2030. The period between now and 2030 will prove to be crucial for the future direction of agriculture and rural communities in Ireland and this new strategy for the Agri-Food sector is an opportunity to shape that future in clear and measurable terms. The EPA has prepared several reports and submissions in recent years that we consider relevant to your work in preparing this new strategy and to which you should have regard (see Appendix for details).

Recurring themes throughout these reports and submissions are:

- Recognition of the **relative importance** of agriculture in Ireland for rural and national sustainable development;
- Identification and quantification of the **pressures** placed on Ireland's natural environment by agricultural and other land management practices which are **causing significant problems** for water quality, air quality, nature and climate change and **risking the reputation** of Ireland as a food producing nation with strong environmental credentials;
- Recognising the **opportunities** available for Ireland in getting it right and being able to prove its credentials as a **world leader** in sustainable, low carbon and environmentally friendly agriculture and land management.

Since the publication of FoodWise 2025, climate change, sustainability and environmental protection have emerged as even stronger factors influencing and shaping the future development of agriculture and land management in Ireland. It is important that this new Strategy for the Agri-Food sector fully recognizes this and the associated challenges facing

agriculture in balancing the conflicting demands of growth and intensification on the one hand and sustainability and environmental protection on the other.

A core principle of FoodWise 2025 was that ‘environmental protection and economic competitiveness are equal and complimentary – one will not be achieved at the expense of the other’. The strategy also stated that ‘future food production systems must be as focused on managing and sustaining our natural resources as they are on increasing production’. **The evidence is now showing that these two objectives have not been met.**

FoodWise 2025 has delivered the intensification and growth in production that it promised but has not delivered the environmental protection objectives envisaged - the natural environment has deteriorated during the strategy period with trends in water quality, greenhouse gasses, ammonia and biodiversity all going in the wrong direction. It is also clear from the evidence that agriculture and other land management practices **are key drivers of**

A key priority for the new strategy must therefore be to demonstrate in a manner that is **measurable, reportable and verifiable** that the agri-food sector is playing its part in reversing these trends by halting environmental deterioration and making measurable and reportable environmental improvements in areas where agriculture is a significant pressure.

The development of a new strategy for the Agri-Food sector up to 2030 is an **opportunity to redress this imbalance** between environmental protection and economic competitiveness.

these negative trends. These deteriorating trends in environmental quality present a significant **threat to the reputation** of the agri-food sector in Ireland which in turn depends on our reputation and marketing advantage as a food producing nation with strong environmental credentials.

The agri-food and land management sectors in both the public and private arenas also need to become and be seen to be as strong advocates for a clean and well-protected environment as they have been for intensification and efficiency. **This re-balancing of focus needs to be a top priority in the new strategy**, otherwise commitments to sustainability and environmental protection risk being seen to be of lesser importance to commitments to expansion, intensification, competitiveness and efficiency.

In formulating the next Agri-Food strategy, the EPA also makes the following recommendations:

- Measures and supports for farmers that can be facilitated through the new Strategy should be **targeted** and aimed towards delivering **multiple benefits** for climate, air quality, biodiversity, water quality and flood protection where possible, taking account of **regional variation**.
- A **whole farm plan approach** should be introduced and facilitated through the Strategy so that farmers can be supported to achieve their business goals in the context of achieving multiple environmental targets.
- The Smart Farming Programme, results-based payment schemes under the European Innovation Partnership programme, and the new ASSAP programme bring the science,

along with environmental advice and support to farmers, in a tailored way that is specific to their farm. These programmes may serve as a useful model for the next Strategy that can be leveraged to achieve targeted outcomes across all the environmental issues.

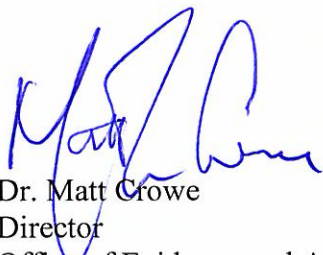
- The relatively slow uptake of **forestry and woodland** is a particular problem that needs a focused response as part of the new Strategy. Increased and targeted planting of trees, for example, through the agri-forestry scheme, can lead to **multiple benefits** for water, air quality, climate change, biodiversity and farm income.
- Currently, the principal model for generating sustainable incomes for farmers is intensification which has been driving the expansion of the dairy herd. This expansion is being subsidised by the environment in places. The new Strategy provides an opportunity to identify and promote **other ways of generating sustainable incomes**, such as diversification, payments for ecosystems services, value adding premium products, ‘green label marketing’, etc.
- Many of the actions set out for farmers under current policies to help with tackling climate change and other environmental challenges are based on driving efficiencies, with an inherent assumption that if farms are efficient they will be environmentally sustainable, which is not the case. Efficiency should be a mandatory baseline so that best use of resources is made. **Efficiencies will not deliver adequate environmental outcomes on their own**, particularly where the efficiency savings are used for further intensification. This new Strategy is an opportunity to develop policies and practices that compliment efficiency gains and that are directly targeting environmental protection and improvements and designed, where possible to deliver **multiple benefits** for water, air, biodiversity and climate.
- A new set of **metrics** to measure and track environmental and sustainability performance linked to agricultural and other land management activity would be worth considering for the Strategy. Metrics need to be developed that are suitable at farm level, catchment level and national level.
- Ireland has strong **national research structures** in place, through Teagasc, the DAFM, the Universities and the EPA research programme, which are generating scientific advancements and innovations that underpin the Irish agricultural sector. Much of the research is multi-disciplinary and multi-Agency which provides a focus on addressing the key environmental challenges in an interdisciplinary way and can support the new Strategy.

Given the overall importance of agriculture and food production to the Irish economy and to rural communities, there is now a unique opportunity, through this new Agri-Food Strategy, to position Ireland as the world leader in sustainable, low carbon and environmentally friendly land management supporting the production of high-quality safe and nutritious foods, renewable energy, sustainable rural communities and valuable inputs to a growing bioeconomy. But, this must be supported by concrete actions to deliver on environmental protection and evidence that these actions are having a positive impact on the environment in areas where agriculture is a significant pressure. The evidence right now is that environmental protection and economic competitiveness have not been equal and complimentary as was envisaged in FoodWise2025 and this is now the opportunity to get this right.

The EPA looks forward to continuing to work with the Department and its Agencies during the development of this Strategy with the overall objective of developing and supporting thriving,

sustainable and resilient agricultural, forestry and marine sectors built on a foundation of a clean, healthy and well-protected environment.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'Matt Crowe', is positioned above the printed name and title.

Dr. Matt Crowe
Director
Office of Evidence and Assessment

Appendix – Supporting Information

1. Relevant EPA Reports and Submissions

- [Ireland's Environment – An Assessment 2016](#), which included a special [chapter on Agriculture](#), November 2016;
- Opening Statement to the Joint Oireachtas Committee on Agriculture, Food and Marine, March 6th, 2018, March 6th 2018;
- [Submissions to DAFM on FoodWise 2025](#), 8th January, 2015 and 28th August, 2015;
- [Submission to DAFM on Nitrates Action Programme](#), 21st May, 2019;
- [Water Quality in 2016 – An Indicators Report](#), November 30th, 2018;
- [Annual Reports on Emissions and Projections of Greenhouse Gasses](#);
- [Reports on Transboundary Gas Emissions](#).

