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Submission on Statement of Strategy 2020-2023

Dear Sir/Madam

We welcome the opportunity to make a submission on your proposed Statement of Strategy for the period 2020-2023. This period will prove to be crucial for the future direction of agriculture and rural communities in Ireland and your new Statement of Strategy is an opportunity to shape that future in clear and measurable terms.

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 Strategy, to position Ireland as the world leader in sustainable, low carbon and environmentally friendly land management supporting the production of high-quality foods, renewable energy and valuable inputs to a growing bioeconomy.

The EPA has prepared several reports and submissions in recent years that we consider relevant to your work in preparing your new Statement of Strategy and to which you should have regard. These include:

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

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 your last Statement of Strategy for 2016-2019, climate change, sustainability and environmental protection have emerged as much stronger factors influencing and shaping the future development of agriculture and land management in Ireland. It is important that your new Strategy 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.

The evidence is clear. FoodWise 2025 has delivered the intensification and growth that it promised but the natural environment has deteriorated with trends in water quality, greenhouse gasses, ammonia and biodiversity all going in the wrong direction. It is also clear that agriculture and other land management practices are key drivers of these negative trends. A key objective for the 2020-2023 period must therefore be to demonstrate in a manner that is measurable, reportable and verifiable that agriculture is playing its part in reversing these trends by halting environmental deterioration and making measurable environmental improvements in areas where agriculture is a significant pressure. The agriculture and land management sectors need to become 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 clearly stated in the new Statement of Strategy, otherwise commitments to sustainability and the environment risk being seen to be of lesser importance to commitments to expansion, intensification and efficiency.

In relation to the four questions posed by you, please see the following responses.

- How well do DAFM services meet the needs of the agri-food, forestry and marine sector and how could they be enhanced?

Overall, DAFM is a strong advocate for the agri-food, forestry and marine sectors. A mechanism through which this could be enhanced during the 2020-2023 period is by ensuring that there is a much greater focus on sustainability and environmental protection when considering existing and new policies and developments for these sectors. These sectors all have the potential to have either positive or negative consequences for the environment, so it is important that environmental and broader sustainable development factors have a significant weighting in policy and implementation decisions. A core objective of all policies should be to protect and improve the environment upon which the food production system and its reputation depend.

The relatively slow uptake of forestry and woodland is a particular problem that needs a focused response during the 2020-2023 period. Increased planting of trees if done in an

environmentally sustainable way 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. Every catchment has a nutrient limit and inefficient nutrient management practices use up the available ‘headroom’, which takes from other farmers and the environment. The environment is effectively subsidising poor farming practices in some areas. 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 and which will support the green credentials of Irish agriculture.

The new Strategy is also an opportunity to address land eligibility rule issues that can result in perverse consequences for the environment. For example, farmers are paid to remove habitats under Pillar 1 of the Common Agriculture Policy to make land eligible for payment and to restore them under Pillar 2 environmental schemes.

- What are the forthcoming market and other challenges that we need to address and is our current focus adequate to meet those challenges?

Key environmental challenges include deteriorating water quality, ammonia emissions, deteriorating biodiversity, growing greenhouse gas emissions and poor land management practices giving rise to carbon leakage. These trends demonstrate that the current focus is not adequate and put the reputation of Irish agriculture at risk. A major shift in focus will be needed for the 2020-2023 period which places a much higher priority on protecting and improving the environment as a core objective of the Strategy and one that supports the green credentials and reputation of Irish agriculture.

- Are there opportunities (e.g. new areas of work) which the Department should consider when developing the 2020 – 2023 Departmental strategy which would advance the achievement of our mission, vision and objectives across the agri-food, forestry and marine sectors?

It may be opportune to revisit the mission and vision to place a stronger emphasis on sustainability and environmental protection as key foundations for a thriving and agriculture sector. As things stand, the economic and social pillars appear to get greater weight than the environmental pillar when considering what is meant by a ‘sustainable agri-food sector’ in the Strategy. The evidence is now showing that the natural environment is deteriorating with agriculture a significantly contributing pressure on the environment. The Department could

therefore use this Strategy to show its commitment to reversing these trends and driving improvements in the quality of the environment in areas with a strong agricultural, forestry and marine presence. Evidence of sustained improvements in environmental quality in areas with a strong agricultural, forestry and marine presence would support the overall ambition of the Irish agri-food sector to be a world leader in sustainable, low carbon and environmentally friendly agriculture and food production.

It is also worth considering how Smart Farming and other exemplar programmes can be expanded through widespread and willing uptake so that the good practices being exhibited on these farms become the norm throughout the sector. It is also important that these programmes have the necessary metrics to be measurable, verifiable and reportable.

- What metrics should the Department use to measure our performance and monitor achievement of our strategic goals?

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. Metrics need to be developed that are suitable at farm level, catchment level and national level. These metrics would then show clearly how the sector is performing in relation to environmental sustainability. EPA data, assessments and research outputs such as Agri-Benchmark are available to assist with this work and the EPA is happy to work with the Department in developing such metrics.

Finally, the EPA welcomes the strategic focus of the Department of collaboration and working with others. There are many interactions between the EPA and the Department and its Agencies including on-going collaboration in areas such as research, catchment management, greenhouse gas emissions inventories, anti-microbial resistance, pesticides management and land-cover mapping. The EPA looks forward to continuing to work with the Department and its Agencies during the next Strategy period 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



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