



2025 Agri-Food Strategy Public Consultation Questionnaire

*BirdWatch Ireland Submission to the
Department of Agriculture, Food and the Marine*

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Summary

Food Harvest 2020 identified the need for a sustainable agri-food sector in Ireland, advanced by credible research and actions including biodiversity conservation. BirdWatch Ireland see there being huge positive benefits to increasing the value of Irish agricultural produce and we are supportive of action to achieve this *Smart, Green, Growth* through raising the environmental credentials and credibility of Irish agriculture. However, these actions must be underpinned by a range of legal and policy commitments to maintain a healthy natural environment. The agri-food sector cannot exist in isolation of the range of national and international initiatives to tackle some of the most pressing issues of our time: loss of biodiversity, degradation of ecosystem services, climate change, and declining water quality.

Unfortunately, not only has there been no delivery of any strategic plan to tackle environmental issues within FH2020, no actions have been taken to even address the likely damage caused to the environment from the actions of FH2020 in any meaningful way. There would appear to have been little delivery of the “Green” element of the “Smart, Green Growth” allegedly at the core of the FH2020 vision beyond ‘niche’ elements. The 2025 Agri-food strategy must not only recognise and accept the impact of productive agriculture on the environment, but also seek to address these impacts through concrete actions, and identify specific ways to address environmental objectives.

Much of the focus of FH2020 was setting and achieving specific output targets, some of which were ambitious, but all somewhat arbitrary in determination. Rather than attaching specific figures to each sector, the scale of ambition should be cognisant of the available resources (both environmental and social). In terms of the environment, which is perhaps most appropriate to the primary production sectors, the scale must be linked to the ability of natural resources to be exploited in a sustainable way. As new technologies and research becomes available the scale of what is achievable may change. Nevertheless, linking targets to what can realistically be delivered by available resources would be the most appropriate method to determine the scale of what can be achieved. Such an approach also encourages and rewards increased efficiency and innovation, both of which are vital in such a competitive sector.

Market opportunities need to be identified internationally (within the EU and beyond), but also within Ireland as well. Whilst it is appreciated that increased exports are desirable, reducing Ireland’s reliance on imports by meeting the need from domestic producers is equally important. Further opportunities to explore for the domestic market should also be considered. Shortening supply chains by increasing awareness and value of buying produce locally should be encouraged. This not only rewards local artisan producers, but will also encourage increased social cohesion through supporting rural communities, and encouraging more local, rural enterprises. In addition to the social benefits, artisan producers offering products locally tend to benefit the environment through increase awareness locally and reduced “food miles” linked to products.

If the strategy towards 2025 seeks to build upon the “*Smart, Green Growth*” principles of FH2020, then actions towards addressing environmental impacts of the agri-food sector must be delivered. Environment protection should be seen as a prerequisite for the sector in Ireland, rather than a challenge to overcome. Working to create a healthy Irish environment that produces healthy Irish food should support marketing opportunities, in addition to offering substantial benefits to the primary sector through the ecosystem services a healthy environment provides.

Any new strategy must be coherent with other national policies and programmes as well as meeting international legal requirements. A wider cross-section of stakeholders must be involved at all levels with the operation of the programme to ensure this wider delivery of benefits. As a guiding principle, all actions within a new agri-food strategy must be tested to ensure they are economically, socially and environmentally sustainable. Where any of the pillars of sustainability cannot be met, the action must be re-designed or rejected. Such an approach would improve the credibility of the sector in addition to the economic, social and environmental prosperity of Ireland.

Introduction

BirdWatch Ireland believes there is huge positive benefit to increasing value of Irish agricultural produce and is supportive of action to achieve this increasing value through raising the environmental credentials and credibility of Irish agriculture. There is a recognised growing demand among consumers to buy agricultural produce that helps to meet a range of environmental quality objectives. This is reflected by public statements from An Bord Bia that “sustainability is key to brand agenda” and other industry driven initiatives such as Bord Bia’s Origin Green and Glanbia’s Sustainability Programme to brand Irish agricultural produce as being environmentally sound. However this is contrary to Ireland having among the poorest record in Europe for compliance with environmental law and key indicators showing declines in bird species that raise significant concern about the health of the farmed countryside.

Farmland Birds and Agriculture in Ireland

Ireland’s biodiversity is facing very severe threats, as evidenced by declining populations of many farmland birds and the loss in extent and quality of many semi-natural habitats in the mosaic of Ireland’s farmed landscapes. Farmland birds across Europe have declined by over 40% in the past 30 years. In Ireland, many previously common farmland birds have suffered major population and range declines since the 1970’s¹. While Ireland has been farmed for millennia, farming practices existed alongside healthy ecosystems. In recent decades we have drastically changed the way we farm. Declining bird populations often indicate declining health of the natural environment. They reflect losses in habitat extent and quality and often equate to losses in ecosystem services which are a valuable asset to Ireland.

Target 3(A) of the EU Biodiversity Action Plan states “By 2020, maximise areas under agriculture across grasslands, arable land and permanent crops that are covered by biodiversity-related measures under the CAP so as to ensure the conservation of biodiversity and to bring about a measurable improvement in the conservation status of species and habitats that depend on or are affected by agriculture and in the provision of ecosystem services as compared to the EU2010 Baseline, thus contributing to enhance sustainable management²”. The Overall Target of Ireland’s National Biodiversity Plan is “that biodiversity loss and degradation of ecosystems are reduced by 2016 and progress is made towards substantial recovery by 2020.”³ Ireland’s Biodiversity Action Plan also has a specific target for biodiversity in the wider countryside to “optimise use of opportunities under agricultural, rural development and forest policy to benefit biodiversity.” Internationally, Ireland has obligations for biodiversity conservation at a European level (preventing biodiversity loss is a priority for the Europe 2020 strategy)⁴ as well as globally⁵.

In addition to the delivery of national and international commitments on biodiversity conservation, and the recognised need to integrate actions toward this end into agriculture and other sectors, sustaining biodiversity also has many positive benefits for farming in itself. These are often under-estimated and under-valued even by the agri-food sector, and include pollination, predator control, maintenance of soil fertility and structure and water management services⁶. According to Bord Bia and others in the agri-food sector, the perceived green image of Ireland gives us a significant competitive advantage when marketing our products abroad. If we are to maintain this image, we need to move urgently to proactively support biodiversity and ecosystem services in the farmed landscape and implement measures where species and habitat losses are most pressing.

¹ Lynas, P., Newton, S.F. & Robinson, J.A. 2007. The status of birds in Ireland: an analysis of conservation concern 2008 – 2013. *Irish Birds* 8: 149-166.

² Communication from the Commission to the European Parliament, the Council, the Economic and Social Committee and the Committee of the Regions: Our life insurance, our natural capital: an EU biodiversity strategy to 2020. July 2011.

³ Department of Arts, Heritage and the Gaeltacht, 2011. *Actions for Biodiversity 2011-2016: Ireland’s National Biodiversity Plan*. Department of Arts, Heritage and the Gaeltacht, Dublin.

⁴ European Commission. 2010. *Europe 2020: A strategy for smart, sustainable and inclusive growth*. Communication COM(2010) 2020 final, European Commission, Brussels. <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:2020:FIN:EN:PDF> (accessed January 2013)

⁵ Convention on Biological Diversity. 2010. *Strategic Plan for Biodiversity 2011-2020*. <http://www.cbd.int/decision/cop/?id=12268> (accessed August 2012).

⁶ National Rural Network. 2011. *Biodiversity as a Resource in Agriculture and Rural Development*. http://www.nrn.ie/wp-content/uploads/2011/08/swig2_biodiversity_as_a_resource_in_agriculture.pdf (accessed August 2012)

However, it is well-documented that many modern, intensive farming practices leave little space for birds or biodiversity⁷. Many birds that use farmland habitats that were previously common have suffered major population declines since the 1970's. In Ireland, these include Kestrel, Skylark and Yellowhammer, with Corn Bunting (a tillage-specialist) becoming extinct as a breeding bird in Ireland, with the last confirmed breeding in the 1990s⁸.

Birds are indicators of the health of the countryside. Like the “canary in the coalmine”, birds can provide early warning systems for the degradation or loss of ecosystems, and the services such ecosystems provide. Birds satisfy many of the criteria of effective indicators, are often used as an early-warning system to detect emergence of environmental problems, and have been widely used to inform decision making and land use management policy including within agricultural ecosystems⁹. The decline in farmland bird populations is telling us that we need to do more to maintain a healthy balance of nature across Irish farmland.

Compliance with Environmental Law

In addition to direct and indirect threats to species and habitats within designated sites (SACs and SPAs), there are a number of requirements in the Birds Directive, the Habitats Directive, and the EIA and SEA Directives to protect species and habitats outside of designated and protected areas. In ECJ Ruling C418-04, the Court found that despite a requirement for Member States to “make a serious attempt at protecting those habitats which lie outside the SPAs” Ireland had not “transposed that provision fully and correctly by taking suitable steps to avoid pollution or deterioration of the habitats lying outside the SPAs. It is thus clear, in the present case, that Ireland must endeavour to take suitable steps to avoid pollution or disturbances of the habitats”¹⁰. This case is still open.

In pursuing the range of targets associated with any agri-food strategy, such as the increase of production, there will be a general requirement for an intensification of land use. While in some areas and land types this may be achieved without any significant negative impacts on the natural environment or on protected species and habitats, there may be other cases where this intensification could result in damage to these habitat types and reduced potential for a range of species and habitats to meet the Favourable Conservation Status (FSC) required by law. It is necessary to develop and implement a range of effective regulatory measures which ensure, beyond reasonable doubt that such impacts will not occur, before such actions are implemented.

The Habitats Directive, also applicable to Birds Directive, outlines a hierarchy of avoidance of adverse impacts, followed by mitigation of those impacts. Mitigation measures are measures which avoid or reduce the impact of the (proposed) activity or activities to the point where the plans or proposals no longer have a risk of an adverse effect. This procedure is laid out in Article 6 of the Habitats Directive and there is a body of guidance and case law which clarifies the requirements.

It is also important to note that European Court of Justice case law against Ireland in the nature and environment field illustrates Ireland's legacy of failures to adequately implement Environmental Law including the Nitrates Directive, the Birds Directive, the Habitats Directive and the EIA Directive and Regulations. This situation reflects how Ireland still does not benefit from a cohesive body of legislative instruments, policy and procedures to protect the environment from accelerating degradation and points to the need for assessment of the impacts and measures to mitigate potential impacts at the source of policy developments (e.g. for a new agri-food strategy) rather than any approach which might rely on existing Irish law and policy to ensure compliance.

⁷ Newton, I. 2004. The recent declines of farmland bird populations in Britain: an appraisal of causal factors and conservation actions. *Ibis* **146**: 579-600.

⁸ Lynas, P., Newton, S.F. & Robinson, J.A. 2007. The status of birds in Ireland: an analysis of conservation concern 2008 – 2013. *Irish Birds* **8**: 149-166.,

⁹ Gregory, R. D., A. van Strien, P. Vorisek, A. W. Gmelig Meyling, D. G. Noble, R. P. B. Foppen and D. W. Gibbons. 2005. Developing indicators for European birds. *Philos. T. R. Soc. B* **360**: 269-288.

¹⁰ JUDGMENT OF THE COURT (Second Chamber) 13 December 2007; Paragraphs 179-181 of C418-04

Birdwatch Ireland's Involvement in the Agriculture Sector and in Food Harvest 2020

BirdWatch Ireland, the largest conservation organisation in Ireland, works altruistically to conserve wild birds, biodiversity and their habitats. Established in 1968, BirdWatch Ireland has over 15,000 members and 28 branches nationwide. The role of the agri-food sector, in particular farming and land management, in delivering a wildlife-rich environment is a priority work area within the organisation. Our vision for rural development is that it must contribute to farming that is sustainable economically, socially and environmentally¹¹. To do this, farming must be well supported (financial or otherwise) to meet the diverse objectives being set for the sector.

BirdWatch Ireland has been closely involved with the agri-food sector in Ireland through many projects, past and present. We recently authored the *Action Plan for Lowland Farmland Birds in Ireland 2011-2020*, which garnered a wide cross-section of support from many stakeholders involved with Irish agriculture, including government bodies and industry representatives.

BirdWatch Ireland was involved in the development of the Food Harvest 2020 as one of two representatives of the Environmental Pillar. In addition to representation on the Food Harvest 2020 Committee, BirdWatch Ireland is also on the *CAP-Post 2013 Consultative Committee*, *Rural Development Programme (RDP) Monitoring Committee* and *National Rural Network Co-coordinating Committee*. BirdWatch Ireland has undertaken a variety of research and conservation projects dealing with the farmed environment, including direct involvement in the operation of REPS measures. BirdWatch Ireland is also responsible for collecting data on bird populations in the wider countryside through the *Countryside Bird Survey (CBS)*. Data from the CBS feed into the *Pan-European Common Bird Monitoring Programme*, which produces the statistics for the Farmland Bird Index – one of only two biodiversity impact indicators for Ireland's RDP.

Through the BirdLife partnership, BirdWatch Is also active in engaging with wider EU policies related to the agri-food sector. It has a representative on BirdLife's Agriculture Task Force, and represents BirdLife on the EU Commission's Civil Dialogue Groups on Animal Products and Rural Development.

Context of this submission

This submission is focused on responding to questions within the *2025 Agri-Food Strategy Public Consultation Questionnaire* as published by DAFM in November 2014. However, additional comments relating to wider-ranging aspects of the interactions between the agri-food sector and the environment are also included. It is envisaged that the agri-food strategy towards 2025 will have some grounding in relation to Food Harvest 2020 (FH2020). As a result, specific reference is made to within this submission to FH2020 in the hope that the 2025 strategy will learn from such issues and experiences related to this current agri-food strategy.

Although BirdWatch Ireland appreciates that the environmental impacts of the agri-food sector cover many areas, including Water, Soil, Air, Climate Change, etc., this submission substantially focuses on impacts and interactions between the agri-food sector and biodiversity.

¹¹ BirdWatch Ireland Strategy 2010-2020

General Comments on FH2020

It is stated that FH2020 is an industry vision for developing the agri-food sector over the short term (2010-2020) and within this submission this is its accepted context. It was authored by a committee consisting of a wide range of stakeholders representing a cross-section of interests in the agri-food sector. FH2020 is based on three equal pillars: Smart, Green, Growth. These pillars are stated as being equal in importance. However, it is clear from the outset that these pillars do not have equal importance, neither in the development of the vision nor in its delivery.

In the original terms of references, the FH2020 Committee was tasked with designing and presenting a strategy for the agri-food sector that maximised the potential for growth within the sector and maximised the smart economy – green (sustainable and/or environmental) criteria were never a consideration. This is further reflected within the original FH2020 committee which comprised some 30 members. Of these just two specifically represented environmental interests; the EPA and BirdWatch Ireland/Environmental Pillar. However the Pillar was brought in to the process late and thus participation was limited. The extent to which environmental considerations were incorporated in to the development of the FH2020 strategy was also limited given that there were only two environmental representatives among a very large group of agribusiness interests. Engagement at that time was based on the premise that a Strategic Environmental Assessment (SEA) would be carried out under the SEA Directive on the FH2020 targets. This would ensure that all relevant environmental considerations would be properly accounted for in all efforts and actions pursued to achieve targets arising from FH2020. The lack of a formal SEA has been a huge cause for concern in the Environmental sector.

This lack of environmental representation continues. The FH2020 High Level Implementation Group, which is chaired by the Minister for Agriculture, the three activation groups (Dairy, Beef and Horticulture) and the Environmental Analysis Steering Committee contain representation from the state, industry and producers. There are no environmental NGO representatives on any of these bodies.

The actual FH2020 vision itself sets 215 recommendations for the sector, of which just 23 (10.7%) are related to protecting (or minimising damage to) the environment. If the true vision of FH2020 (which will presumably be shared by the 2025 Agri-food Strategy) is Smart, Green, Growth, and that these three pillars are equal in importance, then substantial work needs to be done to address the increasing deficit of actions in delivering on the “Green” pillar. At present, the representation of FH2020 being “Green” is fake, undermining not just the FH2020 vision, but Irish agriculture in general, which relies on its “Green” image to enhance market opportunities, particularly in a competitive export market with many other countries competing for an edge to increase market share. The 2025 Agri-food strategy must not only recognise and accept the impact of productive agriculture on the environment, but also seek to address these impacts through concrete action.

Response to Public Questionnaire

1 Has Food Harvest 2020 delivered on its vision for the Agri-Food Sector in Ireland

1.1 Are we on course to deliver on the strategy envisaged in FH2020?

It is clear from the latest *Milestones* document that FH2020 is delivering to the sector increased growth and profitability. Worryingly however, there is no mention in that document's *Foreword* (by Minister Coveney) of the environment and in the *Review* the environment is only mentioned as a challenge for the sector. Within the *Milestones* document, the progress made in relation to the environment is extremely limited, and somewhat misleading. Despite the Department's own environmental review stating that FH2020 would have negative impacts on the environment, including biodiversity, there has, to date, been no attempt made to address this environmental damage by the department or, crucially, the agri-food sector. With continuing declines in many farmland species, and increased threats to sensitive habitats, FH2020 should be seeking to contribute to reversing biodiversity declines. However, not only has there been no delivery of any strategic and meaningful way to reverse biodiversity loss, no action have been taken to even address the likely damage caused to biodiversity from the actions of FH2020. There would appear to have been little delivery of the "Green" element of the "Smart, Green Growth" allegedly at the core of the FH2020 vision.

1.2 How can the strategy for the agri-food sector be improved for the next decade

To maintain environmental credibility, a full and rigorous Strategic Environmental Assessment (SEA) must be undertaken on any future strategy, under the SEA Directive. This must be undertaken at the start of the programme, much as is required for other national policies and programmes, such as the Rural Development Programme (RDP). Where negative environmental impacts are foreseen, the programme must be amended to address such damage. If mitigation measures are proposed, these must be funded through the agri-food sector, in accordance with the Polluter Pays principle, and not left for the public to pay for (as was proposed for FH2020 mitigation measures within the RDP).

If the strategy towards 2025 seeks to build upon the "*Smart, Green Growth*" principles of FH2020, then actions towards addressing environmental impacts of the agri-food sector must be delivered. Environment protection should be seen as a prerequisite for the sector in Ireland, rather than a challenge to overcome. Working to create a healthy Irish environment that produces healthy Irish food should support marketing opportunities, in addition to offering substantial benefits to the primary sector through the ecosystem services a healthy environment provides.

Aside from these broader issues, any new strategy must be coherent with other national policies and programmes (e.g. recommendation from CERDA, National Biodiversity Plan, etc.) as well as meeting international legal requirements (such as the various EU Directives). A wider cross-section of stakeholders must be involved at all levels with the operation of the programme to ensure this wider delivery of benefits.

As a guiding principle, all actions within a new agri-food strategy must be tested to ensure they are economically, socially and environmentally sustainable. Where any of the pillars of sustainability cannot be met, the action must be re-designed or rejected. Such an approach would improve the credibility of the sector in addition to the economic, social and environmental prosperity of Ireland.

1.3 Are there emerging market opportunities that should be considered as part of a new strategy for the sector to 2025

Ireland is unlikely to ever be able to compete with low cost food produced in other countries. It is essential, therefore, that it seeks to deliver quality products. It is widely recognised that an aspect of the quality relates to the environmental sustainability. Ireland's agri-food sector already has a "green" image. However, this is increasingly being challenged by other products with environmental sustainability credentials. With the bar continuing to rise in this area, Ireland's agri-food sector has to respond not only by increasing its quality, but also ensuring that these credentials can be clearly and precisely defined and demonstrated. Claims that Irish agriculture is sustainable against a background of biodiversity decline, poor water quality and habitat loss threatens to undermine the credibility of the sector as a whole. Delivering environmental actions that can be shown to be working are essential. Furthermore, where this is being done, and where successes can be shown to work, must be capitalised upon through appropriate promotion, publicity and branding. This can build upon existing action in this area, such as Bord Bia's Origin Green initiative, but need to go further to ensure there is an evidence base for 'green' claims and that Ireland's remains a leader in producing food with strong environmental recognition.

1.4 What should be the scale of our ambition for the sector

Much of the focus of FH2020 was setting and achieving specific output targets, some of which were ambitious, but all somewhat arbitrary in determination. Rather than attaching specific figures to each sector as FH2020 did (e.g. 30% increase in production in Sector A; 50% increase in market value for Sector B), the scale of ambition should be cognisant of the available resources (both environmental and social). In terms of the environment, which is perhaps most appropriate to the primary production sectors, the scale must be linked to the ability of natural resources to be exploited in a sustainable way. As new technologies and research becomes available the outputs achievable may change. Nevertheless, linking targets to what can realistically be delivered by available resources would be the most appropriate method to determine the scale of what can be achieved. Such an approach also encourages and rewards increased efficiency and innovation, both of which are vital in such a competitive sector.

2 Sustainability/Climate Change

2.1 How can Ireland build on existing policies and standards to promote more sustainable agriculture, forestry and fisheries to meet our national, EU and international commitments in these areas? How do we reconcile these actions with the need to optimise food production, economic growth and job creation

The sustainability of the Irish agri-food sector should not be viewed as a challenge to be met, but rather seen as a baseline upon which the sector must be built and developed. As stated, the Irish agri-food sector trades upon Ireland's "Green" image of a healthy environment, yet the country has one of the poorest track records of any country in the EU for compliance with international environmental legislation and standards. Failing to meet these legislative requirements threatens not only the integrity of the agri-food sector, but the environment on which it depends and the jobs it creates and supports. An urgent and essential fundamental step towards any future strategy must be to improve adherence to environmental requirements. This requires not only appropriate legislation and oversight, but also enforcement and resources to ensure basic, legal requirements can be met.

However, given the essential need to improve in this area, the opportunity to exceed the basic legislative requirements in the area and enshrine a higher national standard in national policy should be explored. Such an approach would help underpin the credibility of the sector in not just delivering on national, EU and international commitments associated with sustainable agriculture, but exceeding the legislative baselines or standards. Securing this position could offer substantial opportunities for the Irish agri-food sector.

2.2 In the context of the development of the agri-food sector to 2025, what specific actions should be taken by farmers/fisherman and the State on:

- **Greenhouse gas emissions and sequestration**

Specifically at the farm-level, and in relation to Ireland grass-based production systems, preventing the ploughing-up carbon-rich soils and increasing periods between re-seeding for grassland would make a substantial contribution to greenhouse gas emissions and sequestration (not to mention biodiversity benefits). Similarly, for tillage enterprises wider adoption of minimum tillage practices would be of benefit, as would increased use of low-emission slurry-spreading. For these latter two, which are currently operated in Ireland through agri-environment-climate schemes, mainstream them into production agriculture (possible included within certification schemes), would be beneficial, especially where sectoral efficiencies can be demonstrated. Protection of wetlands on agricultural land and other natural habitats with carbon capture capacity, rather than an assumption that monoculture plantation as an appropriate mitigating measure.

The fishing industry can lower its fuel costs, reduce its greenhouse gas emissions, and decrease the damage it inflicts on marine ecosystems. Reducing the carbon footprint of fisheries fuel use (and consequently greenhouse gas emissions) varies considerably depending on the fishery. Fishing on depleted fish stocks requires more fuel per kilo landed fish than fishing on abundant fish stocks, because low fish abundance forces fishers to search longer and use heavier gear to catch the fish. If fish stocks were allowed to recover, less fuel would be needed to catch the same amount of fish. In addition, enhancing fish abundance will allow fish populations to become more resilient to the impacts of climate change.

- **Air, water and soil quality**

In addition to the measures indicated above (ploughing reduces the ability of soils to hold water, resulting in increased erosion and water flows), it has been widely demonstrated that improved management of inputs (fertilisers) can reduce run-off and pollution into water courses. In addition to maintaining water quality, rainwater harvesting schemes should continue to be promoted to reduce reliance on groundwater.

- **Biodiversity**

Aside from agri-environment-climate actions to address specific biodiversity issues, some broader-scale conditionality must be introduced to protect habitats and halt biodiversity declines. In addition to the methods already discussed, the safe use of pesticides, including rodenticides, should be enshrined within basic legislation and requirements for all agri-food producers. Similar basic measures should include the control of invasive species on every farm.

- **Bioenergy development**

- **Sustainable fisheries and aquaculture**

Both fisheries and aquaculture should be in line with achieving environmental objectives. A significant reduction of green house gas emissions can be achieved by switching from fuel-intensive techniques such as dredging, bottom trawling and beam trawling, to alternative techniques that use less fuel. A change in fishing methods and gears can be promoted by removing environmentally harmful fuel subsidies and phasing out fuel tax exemption for fisheries, while at the same time providing financial and other incentives for alternative fishing techniques.

In terms of aquaculture, there are no species that are sustainable as such. The sustainability of a species depends on its feeding and lifecycle habits, as well as the farming operation. Only species that are plant eaters, who can breed in captivity, and whose farming does not produce high levels of nutrient output can be cultivated sustainably. In the case of wild fisheries stocks fished only at levels that allow fish stocks to recover and use ecologically friendly fishing gear and tools including protected areas in line with requirements of the Common Fisheries Policy.

Unsustainable aquaculture can negatively impact our oceans and the environment and on local people's food and security. Such impacts include the extraction of marine species from oceans, including wild juveniles vital for future stock growth, increasing the burden on wild fish stocks and having major food security implications; the release of organic wastes (which can act as plant nutrients for harmful algal blooms) and toxic effluents into the oceans; the destruction of coastal ecosystems, displacement of coastal communities and depletion of fresh water sources to build aquaculture ponds.

The status of fish stocks in Irish waters indicates that much remains to be done in this area – Ireland's current position on sea fisheries is not sustainable. In the case of aquaculture, compliance with environmental objectives including licensing and environmental assessment and assisting with achieving conservation objectives of Special Protection Areas should be included in ambitions of FH2025.

3 Global market context including opportunities for FDI (Foreign Direct Investment)

3.1 What major changes/challenges are likely to emerge in the global market for food and drink in the period to 2025?

It would seem likely that climate change impacts will be a serious consideration for global food production. As a relatively efficient food producer in terms of emissions, Ireland should seek to put pressure on less efficient producers to improve their operations. However, Ireland also needs to ensure that emissions within the Irish agri-food sector are reduced to lower climate impacts in other countries as well as enhance the value and attractiveness to consumers of Irish produce. Ireland's own food security and domestic demands need to be assessed in the context of growing our exports, climatic and landscape changes in Ireland as well as abroad.

3.2 How could Ireland be better placed to compete in the global market over the next decade?

As noted, Ireland are unlikely to be able to compete in terms of price for the production of cheap food, but should rather seek to lead the way in quality production, including reducing environmental impacts from the agri-food sector. This needs to be matched with an appropriate evidence base as Ireland otherwise risks losing credibility. This offers increased market access as well as improved prices for premium products to Irish producers. In addition, such an approach also contributes (through reduced climate impacts) to enabling climate-stressed regions to better produce their own food, thereby helping to meet the challenge of addressing global food security.

3.3 Should Ireland seek to better identify and target high value niche markets, and if so how?

Market opportunities need to be identified internationally (within the EU and beyond), but also within Ireland as well. Whilst it is appreciated that increased exports are desirable, reducing Ireland's reliance on imports by meeting the need from domestic producers is equally important. This is perhaps best demonstrated by Ireland's reliance in the importation of horticultural and organic produce. Identifying opportunities to replace the demand for imports with what can be produced within Ireland should be simple. Further opportunities to explore for the domestic market should also be considered. Shortening supply chains by increasing awareness and value of buying produce locally should be encouraged. This not only rewards local producers, but will also encourage increased social cohesion through supporting rural communities, and encouraging more local, rural enterprises. In addition to the social benefits, artisan producers offering products locally tend to benefit the environment through increase awareness locally and reduced "food miles" linked to products.

Niche markets, as opposed to mass markets, typically attract higher product prices but generally require increased initial investment to bring that product to market. With a well educated and trained agri-food sector, coupled with good technological support, Ireland is in an excellent place to identify niche markets and bring specialised products to those markets. The opportunities presented by these markets can change over short period of time, so the sector needs to be able to accurately identify and predict market trends and opportunities.

3.4 Should we encourage increased international investment (FDI, Joint Ventures) in our agri-food industry and/or develop strategic alliances with partners in rapidly growing markets

4 Competitiveness & Innovation

4.1 What can be done to improve the competitiveness of the agri-food sector over the next decade? Are there examples of best practice from abroad that could be adopted in Ireland?

The focus of research into increasing efficiency in the sector, particularly in relation to carbon emissions and resource exploitation, appears to have developed a strong critical mass in Ireland, and this must continue to be supported if further benefits are to be realised. Research into impacts of resource (soil water biodiversity) depletion and potential measures to address and avoid depletion of resources is now required as a matter of urgency. In particular, win-win scenarios for production and sustainability (including achieving environmental or ecological objectives) need to be more fully explored, and the value of such actions demonstrated (e.g. calculating the economic value of ecosystem services in food production in Ireland) and publicised. This has to be done within the sector to ensure it realises the intrinsic value of such actions as this will foster continued support for progress, as well as sustaining investment in developing such approaches. Additionally, these values must also be promoted to consumers to ensure they are aware of what the Irish agri-food sector is offering.

4.2 What measures should be adopted at farm level to improve competitiveness

As discussed above, improved training and advisory actions for farmers would be a major component in improving competitiveness in the sector. By its nature, farmers tend to maintain traditional (familiar) production systems, and these may not always offer the best returns for the sector, where new technologies and methods, particularly those where there is increased efficiencies, could be applied.

4.3 What measures should be adopted at industry level to improve competitiveness

Industry should seek to provide more balanced support for research looking at the development of various strategies associated with the sector, and not just those linked to increasing production or economic output. The critical mass developed within the Irish agri-food sector in dealing with emissions needs to be continued,

but diversified into other aspects of environmental sustainability (such as supports for research into ecosystem functioning).

Certification schemes should continue to be developed and promoted, particularly those that seek to enhance the environment. As a matter of urgency, schemes that promote biodiversity conservation through education and direct action on the farm, to preserve habitats and species that occur there, should be explored, developed and operated at varying levels (from basic quality assurance-type schemes to higher-level targeted programmes). The benefit of differing schemes is that they tackle the environment in differing ways – high participation schemes have the potential to contribute to the environment, even if only small action are operated on a n individual farm, due to their scale of operation. More targeted programmes can deliver on specific areas, similar to the operation of agri-environment measures.

4.4 What emerging/existing technologies might significantly impact on the agri-food sector in the years ahead?

4.5 How can we maximise job creation within a competitive agri-food sector over the next ten years?

Perhaps the most important first step for jobs in the agri-food sector is to ensure that existing jobs are being maintained. In the primary production sector, where family farms are a major component, this means more investment in rural communities to ensure social sustainability in the area. These investments could be linked to enhancing further opportunities within the agri-food sector, such as setting up or supporting artisan producers utilising locally-grown or reared produce. This has the additional benefit of adding value to produce, enhancing returns from investments.

A similar approach, of supporting local jobs through small and medium-sized agri-food enterprises in such localities will strengthen the sector as a whole, making it more resilient to risk and increasing the opportunities to explore and exploit new market opportunities.

4.6 What areas should we prioritise to encourage increased innovation in the agri-food sector?

Although innovation is essential to maintaining a competitive edge in the market, one of the most critical deficits identified in the Irish agri-food sector is the limited scope and impact of knowledge transfer actions. This is probably most evident in the primary production area, but applies throughout the whole sector at varying levels. Educational supports, including life-long learning opportunities for farmers and continued, professional development for processors must continue to be explored and developed. Successful techniques, such as discussion groups or peer-to-peer learning supports for farmers, or mentoring actions for processors, should be promoted and expanded.

5 Risks

5.1 What do you consider the most critical risks facing the Irish agri-food sector and rank in order (1=highest risk, etc.)?

- 1: Erosion of Brand Ireland through lack of action for environmental objective in the farming sector (ecological in particular) i.e. lack of evidence base behind sustainability claims
- 2: Short-sightedness - looking for short-term gains economically and not seeing the value of strategic planning
- 3: Loss of ecosystem functioning that supports food production
- 4: Climate Change
- 5: Competition from external markets
- 6: Ability of the land to produce food (intrinsic fertility)
- 7: Poor knowledge of production systems and failure to capitalise on new technologies/efficiencies
- 8: Lack of specific for independent, small-scale, local producers
- 9: Internal and external price volatility and economic uncertainty in national and international markets
- 10: Over-reliance on a very small number of producer types (e.g. dairy)

5.2 What measures should be taken to mitigate or better manage potential market and economic risks?

Secure a comprehensive evidence base behind sustainability claims. Invest in and undertake strategic planning to limit the negative consequences fo short-term gains. Ensuring there's not an over-reliance on marketing one food sector, and instead supporting and encouraging a diversity of produce (along with 'biodiversity') in the agri-food sector.

5.3 How can we best manage risks to food safety, animal and plant health?

Recent threats to food safety tend to have arisen through a drive to lower prices at the expense of quality production, and increased reliance on external inputs to production systems (such as chemical fertilisers and pesticides). Improving the quality associated with food being produced and taking the emphasis away from solely seeking to drive down production costs, requires a substantial change in the mind-set of the Irish agri-food sector. However, through proper controls, regulation and compliance monitoring, to include enforcement and penalties as required, would be essential to ensure resilience in the system.

Reducing dependency upon external inputs such as chemical fertilisers and pesticides, is also essential. Again, this can be done through appropriate legislation and enforcement, not least by enshrining integrated pest management obligations from the Sustainable Use Directive within Irish legislation and policies. Further improvements in this area, from enhancing the legislative baseline required, could add further value and efficiency, whilst reducing reliance on and exposure to such inputs.

Finally, and perhaps most importantly, efforts must be taken to improve ecological functioning within production systems. This would be partly addressed by meeting obligations under the Sustainable Use Directive, but efforts to ensure ecosystem services are recognised and preserved must go further than basic legislative requirements. A healthier environment produces more resilient and healthier food. Furthermore, such an approach reinforces the environmental quality associated with Irish food production that the agri-food sector should be seeking to exploit to maintain a competitive edge in national, European and global markets.