Submission to DAFM in relation to Food Harvest 2025

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*Are we on course to deliver on the strategy envisaged in Food Harvest 2020?*

Food Harvest 2020 has been a success in terms of achieving the targets set within it. The agri-food sector has experienced growth, and has become a pillar of our economic recovery post bailout. The twin themes of jobs and growth have provided the skeletal framework for both the Food Harvest policy and indeed the measurement of its success. However to ensure the claimed sustainability aspects of the sector the deficit in addressing the environmental impacts and concerns must be addressed.

This deficit is evident in the lack of a progressive approach to dealing with emissions from the sector, and the insistence that increased outputs can be achieved without increased emissions. The natural capital underpinning the sector must receive due consideration in any replacement strategy, and the full Strategic Environmental Assessment process must be adhered to.

**Designing a new strategy**

*Has Food Harvest 2020 delivered on its vision for the Agri-Food\* Sector in Ireland?*

Designing a new strategy for the sector, with a built in ten year milestone offers room for significant improvements on what has gone before. These include:

1. The inclusion of the principles of sustainable development, as defined at Rio in 1992, in a methodology of achieving the targets for growth within the strategy.
2. The Department and the government taking full ownership of the strategy, by adopting it as a government strategy. This opposed to the approach taken with FH2020, which was an industry led initiative, and industry designed strategy, that was then implemented by DAFM.
3. This promotes transparency, and allows the general public to understand the aims, objectives and priorities of DAFM.
4. An early commitment to apply the SEA directive to the strategy.

*What should be the scale of our ambition for the sector?*

1. An explicit commitment to design a strategy that gives equal consideration to the three pillars of sustainability, economic, social and environmental.
2. The committee designing the strategy should reflect this commitment by having equal representation of the three pillars of sustainability – certainly the economics of the strategy are critical, but the social implications for farming and rural communities should be considered and equal importance given to the natural ecosystems that are the foundation of the industry.
3. A consideration of concepts such as natural capital accounting, ecosystem services auditing, and full ecosystem management systems to be applied to the development of the strategy.
4. A full cost-benefit analysis of the strategies targets needs to be inclusive of all costs, and a financing source for alleviating any environmental degradation needs to be in-built. The current attempt to use public money through the RDP to fund environmental reparation cause by private profit making industry cannot be acceptable.
5. Develop a detailed delivery mechanism for the targets and goals of the strategy – specifically identify the practical activities at farm level that are required to achieve the targets set out.
6. An inclusion of the polluter pays principle built in to the strategy’s delivery mechanism.
7. Achieve consistency with the concept of high value high quality output and supports for extensive farming models producing high quality produce including organic farming.
8. Develop an agri-food strategy that places Ireland at the forefront of sustainably produced high quality low impact food, and use that model as a basis for the negotiating position taken in European discussions on the future direction of the Common Agricultural Policy.
9. To ensure a true measurement of the emissions associated with the strategy, and to acknowledge the feasibility of measuring emissions at the farm level.
10. To put in place the supports required to achieve farm level emissions management.
11. To embrace the challenge in addressing the carbon footprint of food production instead of seeking a derogation from the requirements to reduce emissions.
12. To recognise the opportunity to be a world leader in the area of creating low impact high value agri-food strategies.
13. To provide a working model of best practice for a 21st century agri-food model.

**Sustainability/Climate Change**

*How can Ireland build on existing policies and standards to promote more sustainable agriculture, forestry and fisheries and 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?*

There is no need to reconcile the need to meet environmental regulation and obligations with growth and job creation as with a creative sustainable strategy these elements needs not be in conflict. Unless all job creation and growth within the sector has long term viability built in, using as a minimum the existing environmental regulations, there will not be any long term future for the sector. This is an opportunity to embrace the need for a sustainable, long term viable farming sector and to consequently offer security in terms of job creation and to offer low risk growth opportunities.

In terms of food production, priority should be placed on food production with the lowest carbon emissions. Extensive and organic farming models need to be valued based on their low environmental impact.

A forestry model that is not based on non native monocultures of poor quality timber designed to be clearfelled is critical to ensure jobs and growth within that specific sector. A commitment to native provenance trees for example would allow nurseries to develop business plans that would provide local employment and give an economic boost to their immediate locales and beyond.

As the state forestry company, Coillte needs to be subject to a complete review. As the single biggest player in the forestry sector its commercial remit should not be treated as a license to ignore sustainability. The returns to the exchequer from the company should be measured against the subsidies provided to it. As a country that is failing year on year to meet its afforestation targets it is questionable, at best, that the state forestry company is not active in afforestation. The use of our state forests as a carbon sink highlights the importance of this sector to the whole agri industry model. The lack of data leaves our whole forestry program open to ridicule. It remains unclear if we are harvesting trees on a national level at a rate that is actually leading to a national deforestation program.

These elements demand urgent addressing as part of any new strategy.

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

* + *Greenhouse gas emissions and sequestration*
  + *Air, water and soil quality*
  + *Biodiversity*
  + *Bioenergy development*
  + *Sustainable fisheries and aquaculture*

The priority has to be accurate measurement. There is a lack of baseline data on soil quality and soil biodiversity. As the critical natural asset under pinning the agricultural sector, soil needs to be prioritised, and any national strategy should consider the need for the government to support a new soil directive for all member states of the EU.

The precautionary principle should be strictly applied when determining the suitability of any action affecting the above.

**Risks**

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

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

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

The unknown variables that will affect business as a result of the impacts of climate change need to be constantly considered and attempts made to identify and mitigate against them.

Incumbent on any agri-food policy is recognition that activities that drive climate change, habitat and biodiversity loss cannot be integral parts of the mechanism of achieving the goals of the policy.

There is a considerable risk to our agri-food sector if we allow for GMO to be part of our strategy. Once the country loses its GMO free status there is no going back. Our “green” image would be irrevocably damaged. At a farm level the devastating problems associated with the development of superweeds (weeds resistant to the prescribed weedkillers) could not only bankrupt individual farmers but remove the capacity of the land to give any productive return.

It must be ensured that any “green” credentials that are claimed by the sector or by the strategy are well founded. There has been a tendency to claim environmentally sustainable practices when the reality on the ground does not meet the marketing rhetoric– nowhere more evident that in the timber industry with unsustainable practices being certified as green.

This risk of loss of reputation should be guarded against by increased robustness in examination of the claimed credentials of the strategy.

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