



IRISH CATTLE AND SHEEP FARMERS' ASSOCIATION



Submission on the
Food Harvest 2020
Environmental
Analysis Report

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Introduction

ICSA welcomes the opportunity to make this submission on the draft Food Harvest 2020 Environmental Analysis Report. Having been a member of the original Committee, ICSA acknowledges the vision and objectives of the Food Harvest 2020 Strategy and commends the drive to allow the Irish agri-food industry to grow and prosper sustainably through the delivery of high quality, safe and naturally based produce.

It is obvious that agriculture is of key importance against a backdrop of increasing international concern about food security, the need for alternatives to non-renewable fossil fuels and the global imperative to combat climate change. In the context of aiming to promote and market Irish-sourced food as green and sustainable, the ICSA notes the value of assessing the potential environmental impacts of implementing the targets of Food Harvest 2020.

Expansion of any farm product needs to be in line with an increase in viable markets. ICSA is concerned about the 40% target for increased beef output, as promoted by the Beef Activation Group in the absence of clear evidence that such increases can be achieved while retaining or improving current beef price. Instead, the original FH2020 target of a 20% increase is more realistic in the view of ICSA.

ICSA acknowledges the point raised in the report which notes the problematic situation for Ireland, wherein its emissions baseline already contains a significant degree of agriculture-based emissions, which cannot be rapidly reduced without also reducing the numbers of livestock in the country. The Irish Government therefore needs to engage more at international level to have the focus for agriculture shifted away from blunt emissions targets. Accordingly, agriculture should be treated differently because of its specific relative importance in our economy and also because of the global imperative for increased food output to deal with population growth and the food security challenge. Hence, the focus needs to be on both emissions and sequestration with fair allocation of sequestration to the farm sector. Emissions need to be assessed on the basis of emissions per kg of output and this must in turn be compared with the international alternatives.

Account also needs to be taken of the fact that the broad Irish landscape and rural environment is inextricably linked with farming activity. Farmers shape the rural landscape and are its custodians; this underpins a lot of what Ireland's tourism offering is all about. It is for all these reasons that the EU regularly refers to the concept of multi-functional agriculture. While the key traditional role of agriculture continues to be food production, so much more is dependent on its ongoing viability.

In this context, ICSA recognises the thorough and cross-cutting analysis undertaken by the report authors. For the most part, ICSA believes that the analysis accurately addresses the key environmental concerns from an appropriate scientific standpoint; any specific concerns regarding the report's assumptions, methodologies, findings or recommendations are described in this submission.

Key issues

Report needs to be updated to reflect recent changes in agriculture policy

ICSA notes that the report authors began working on the analysis in 2012, while negotiations were still at an early stage in relation to the Common Agricultural Policy 2014-2020. Significant movement away from the European Commission's original proposal has occurred since its publication, culminating in the deal agreed in Luxembourg and Brussels in June 2013. As the CAP has an over-arching impact on the development of Irish agriculture, through both funding and policy requirements, it is inextricably linked to working towards the targets of Food Harvest 2020.

The Environmental Analysis Report, authored prior to the CAP deal in June, now needs to be updated to reflect the structural changes which this next period of CAP reform will bring about. Sections 1.5.1.1 and 1.5.1.2 need to be updated with a summary of the reformed CAP's mandatory and voluntary measures; the 'no-change' assumptions described in Section 2.4 may now also need to be re-drafted, given that these were based on a hypothesis of no CAP reform post-2013. Furthermore, ICSA consider it prudent for the authors to revisit the assumptions of the FAPRI model and sectoral analyses to take into account the potential structural changes in Irish agriculture which the following CAP outputs may influence:

- Internal partial convergence of direct payments
- Minimum per hectare payment at 60% of national average
- Overall reduction to CAP budgets (particularly Pillar 2)
- Potential for re-coupling of direct payments
- Potential for redistributive payments
- Finalised greening requirements

Any reassessment in this regard is of course dependent on the Irish Government's implementation of the various voluntary measures, some of which may not be applied in Ireland. It is expected that the Minister for Agriculture will make decisions relating to Pillar 1 before the end of 2013 and Pillar 2 soon after. Given the parallel periods of implementation, the 2014-2020 CAP and Food Harvest 2020 must now be considered using a holistic approach, ensuring that the reformed CAP can deliver both improved productivity and enhanced environmental conditions on Irish farms.

More reference needs to be made to existing schemes which can deliver knowledge transfer or environmental benefits

The Environmental Analysis Report focuses very strongly on the value of advisory services, as provided by Teagasc or independent farm advisors; these will form a key part of delivering measures inherent in the 'High Technology' scenario. However, the report does not highlight the value of other programmes which may also contribute to the up-skilling of farmers. The Beef and Sheep Technology Adoption Programmes (BTAP & STAP), while relying to some degree on a facilitator or advisor, are at their core dependent on direct discussions between farmers. Such interaction can very readily facilitate the dissemination of technical improvements amongst farmers which can feed into the overall targets of FH2020. Given that the specific tasks covered in the programmes relate to breeding, grassland management and improving quality of output to meet market specifications, it is clear how the TAP approach can contribute to delivering on environmental goals.

Since the production of the original report, the Department of Agriculture in Budget 2014 announced the Beef Genomics Scheme. This programme will provide a payment to suckler farmers whilst collating a comprehensive genomic database through representative DNA sampling of the suckler herd. The development of this database and its implications for improved genetic merit of the suckler herd will form the backbone of one of the main cost-prohibitive mitigation measures described in the report. As such, the potential environment benefits of this new scheme should be added to the existing analysis report.

ICSA wishes to highlight a concern regarding the overall heavy focus on knowledge transfer in the report, which makes no reference to possible heterogeneous uptake of the 'high technology' scenario. The drystock sector by its nature is a relatively lower-technology sector when compared to dairy or tillage, and the demographic is also older; the Teagasc National Farm Survey indicates that suckler farmers are on average 6.5 years older than dairy farmers. In this context, promoting adoption of newer technologies on these farms may prove more difficult than for other sectors. Actions to specifically address these issues therefore need to form part of any 'high technology' strategy rolled out.

More detail required in relation to implementation of mitigation measures through agri-environment schemes

ICSA is of the opinion that while the report makes excellent points in relation to mitigation and monitoring, many of the recommendations are too strategic and need to be more practical and focused, particularly concerning agri-environment schemes. Given that the vast majority of Pillar 2 funding has been (and will continue to be) allocated to agri-environment, disadvantaged areas and Natura 2000 site management, the report recommendations need to be more practical, as opposed to advisory-centric as they currently appear. In recent years there have been several very hasty and ill-considered decisions to impose severe cutbacks on key environment-related supports for farmers, most notably the decision to close REPS to new entrants and by definition to begin the process of phasing it out altogether. The subsequent AEOS scheme has been significantly more restricted in scale, in both geographic and financial terms. Regardless of whether all targets of FH2020 are pursued to their full extent, it is difficult to see Ireland can avoid some negative impacts to the rural environment without clear Government commitments to the funding of well-designed agri-environment schemes.

There is a need for the Minister to increase his engagement with all farming organisations, with a view to the implementation of a robust and substantial agri-environment scheme in the post-2013 CAP framework. This is especially important in light of a proposal at EU level that agri-environment-climate schemes must account for at least 30% of Rural Development funding. Farming organisations and their members will need to be consulted in relation to the design, targeting and implementation of any new scheme. Only through compiling the experience and practical knowledge of farmers can new schemes be effectively and efficiently designed to account for regional differences in farming practices and agricultural landscapes. Schemes which facilitate simple monitoring of their implementation and outputs are advocated, as these will allow farmers to demonstrate their engagement with the overall protection of the rural environment.

Development of a robust and workable framework for agri-environment schemes is of course dependent upon funding. It is of critical importance that the Government commits to maximising exchequer funding for such schemes, thereby taking full advantage of EU co-

financing which can be applied to new measures aimed at protecting and enriching the environment; the Government needs to be pro-active in this regard and budget for more than the 25% minimum exchequer co-financing rate. Such schemes can be applied in tandem with the expansion envisaged under FH2020, and may in some cases be designed specifically to match the types of agricultural sector growth that are proposed.

Some examples of new and better targeted agri-environment schemes which ICSA advocates including in the analysis report as possible case studies:

- Nitrogen-reducing AE scheme – Farmers would receive payments for sowing a percentage of their land with clover or legumes for grazing or silage production. Such pasture would have the benefit of reducing the overall farm requirement for fertilizers, which by association reduces GHG emissions in the production of such products and reduces the risk of waterbody eutrophication. As red clover swards in particular tend to lose vigour after three years on average, AE funding is required to allow farmers to re-seed or over-seed to maintain productivity levels;
- It is strongly recommended that a new replacement AE scheme be introduced with even greater objectives toward expanding and reinforcing Ireland’s hedgerow network. In a country predominantly devoid of forests, hedgerows provide a significant proportion of Ireland’s carbon sequestration resource. This should be applied in tandem with Government pressure to have other habitats beyond forestry factored into Kyoto carbon calculations;
- Protection of watercourses leading to improvement in local water quality is of key note in the expansion proposals of FH2020. As in REPS, farmers should be rewarded for increasing river margins and excluding livestock from waterbodies. Promoting farmer engagement in this regard will also assist in the delivery of the requirements of the Water Framework Directive;
- A new agri-environment-climate scheme should be developed utilising the benefits of permanent pasture from an emissions perspective, by targeting land that is farmed in a sustainable way (i.e. minimum ploughing and fertilizer application);
- In relation to farm forestry, ICSA wish to highlight concerns over budget-related discussions which have suggested the idea of reducing the farmer-specific premium from 20 years to 15 years. These premiums are vital in incentivising farmers to establish and manage plantations which act as carbon stores and are valuable in relation to biodiversity conservation. As such, it is strongly recommended that the current 20-year premium period is maintained.

In the context of the preceding points, ICSA advocates that the analysis report needs to more strongly emphasise the need to expand upon Ireland's current agri-environment programmes. This cannot be achieved through merely investing in knowledge transfer and related advisory services; to ensure that such knowledge transfer is successful, a substantial and well-funded agri-environment scheme needs to be put in place to replace REPS. AEOS is not that scheme, as it is too limited in scope, ambition and relevance to be of much use to productive farmers especially. There exists a tremendous opportunity to develop a new AE programme which uses the FH2020 sustainability and expansion targets as a reference, making mitigation and monitoring central to its implementation.

On a related point, ICSA is concerned about the approach of the Department, on foot of EU pressure, on land eligibility in relation to the Single Farm Payment. Recently, there has been an apparent negative focus leading to the exclusion of certain habitats found on farmland, resulting in up to a 100% reduction of an applicant's SFP for a particular land parcel. This has the potential to result in the active removal of scrub, semi-natural grassland, trees and other habitats which are of benefit to biodiversity. Such policy lies in direct contrast with the current or future Rural Development Programme wherein an objective is to preserve valuable habitats within the agricultural landscape.

Comments on recommended actions

Bespoke environmental knowledge CPD courses to be developed and delivered by Teagasc/Universities for professional agricultural advisors and consultants.

ICSA acknowledges the value of developing novel knowledge transfer channels; training should facilitate targeted knowledge transfer for sub-sectors and demographics where 'high technology' opportunities are less apparent.

Create a formal structure to ensure that the output of the Teagasc Research Service is made available on an equal basis to both private and public sector advisors.

ICSA agrees with this equitable approach which will ensure that private advisors and consultants are not compromised due to their greater separation from the Teagasc Research Service.

Future agri-environmental programmes should be designed to achieve the delivery of targeted environmental advice and best outcomes at individual farm level.

ICSA advocates that practical consultation with individual farmers regarding agri-environment scheme implementation at individual farm level is the best route to successful and measurable outputs.

Devise and implement a best environmental practice certification scheme which could be modelled and linked to the Origin Green Scheme. (To cover all on-farm inspections and certification, and to include all environmental areas such as traceability, animal welfare, food miles, carbon footprint etc).

ICSA has consistently lobbied for reduced bureaucracy for farmers and would be supportive of an integrated inspection and certification regime insofar that it would not lead to a transfer of administrative burden from the Department to the individual farmer.

Develop an integrated and iterative monitoring programme for key indicators impacting biodiversity and water quality.

ICSA encourages the development of an iterative monitoring programme with carefully selected indicators; while REPS was anecdotally very successful in improving environmental conditions, lack of reliable baseline data made it difficult for farmers to statistically demonstrate such benefits. Farmers, as custodians of much of Ireland's natural landscape, are keen to be able to show the public good from cross-compliance and agri-environment schemes.

Recognise the role and responsibility of all players in the agri-food industry including: farmers, processors, exporters, retailers and regulators.

ICSA advocates that parties in the agri-food chain that are dependent on producers also need to be subject to the same or greater degree of compliance, inspection and testing as currently exerted on farmers. Traceability from the farm needs to extend all the way through the processing and export chains. Regulators in particular need to ensure that a level playing field exists for all players in the industry.