



SUBMISSION TO THE DEPARTMENT OF AGRICULTURE, FOOD
AND THE MARINE IN RELATION TO THE PUBLIC CONSULTATION
PROCESS ON THE AGRI-FOOD STRATEGY 2030

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INTRODUCTION TO AN FÓRAM UISCE

An Fóram Uisce | The Water Forum was established in June 2018 in accordance with the provisions of Part 5 of the Water Services Act 2017. An Fóram Uisce is the only statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. An Fóram Uisce consists of 26 members including representatives from a wide range of organisations with direct connections to issues relating to water quality and public water consumers. Approximately 50 different organisations were involved in the nomination of members.

The role of an Fóram is that of a strong independent stakeholder body contributing to water policy, which supports public and stakeholder engagement on all matters relevant to water. One of the strategic themes of an Fóram is reviewing and advising on the implementation of Ireland's River Basin Management Plan, which sets out Ireland's requirements and objectives to meet the EU Water Framework Directive. The current River Basin Management Plan, 2018-2021¹ is coming to an end, while the 3rd cycle of the River Basin Management Plan 2022-2027 will be published later in 2021.

While this submission reflects the view of An Fóram, it does not necessarily reflect the full views of any constituent stakeholder group.

BACKGROUND TO SUBMISSION

An Fóram Uisce welcomes the opportunity to respond to the Public Consultation on the draft Agri-Food Strategy 2030, hereafter the Strategy. An Fóram Uisce welcomes the ambitious targets outlined in the draft Strategy to be a world leader in Sustainable Food Systems, reducing greenhouse gas emissions and nutrient losses to water bodies, while increasing the proportion of farmed area for biodiversity. An Fóram also recognises the scope of work undertaken by the Department of Agriculture, Food and Marine (hereafter, DAFM) to develop the draft Strategy, along with the Strategic Environmental Assessment (SEA) Environmental Report, carried out by RSK Environment Ltd.

An Fóram acknowledges the efforts of the agricultural sector in Ireland to address environmental issues in recent years. It is becoming more apparent that many farmers throughout Ireland have a willingness to transition to sustainable farming practices but are often restricted due to reductions in farm payments. It is hoped that the upcoming Common Agricultural Policy (CAP) Strategy will allow for farmers to be rewarded for attaining various environmental outcomes for water, air, climate and ecosystems through results-based payments. To this end, An Fóram urges the Irish Government to support the mainstreaming of the results-based payments approach. The success of the environmental outcomes within the Agri-Food Strategy will require the active participation and cooperation of the farming community, allowing farmers to co-design and co-create the proposed actions.

While an Fóram welcomes the ambitious environmental targets within the draft Agri-Food Strategy, there remains a concern over the lack of detail of how these targets can be achieved. While an Fóram acknowledges the 'balanced approach' adopted in the Strategy, our view is that it is sceptical as to how a reduction in environmental pressures (Mission 1) can be implemented simultaneously with

¹ Department of Housing, Local Government and Heritage, "River Basin Management Plan 2018 - 2021," 2018. [Online]. Available: <https://www.gov.ie/en/publication/429a79-river-basin-management-plan-2018-2021/>.

increasing competitiveness and productivity (Mission 2), and we are concerned that this would not be achieved.

While the Forum's submission is focused on water-related aspects of the draft Strategy, it has recently adopted a systems-based approach for catchment management called the Framework for Integrated Land and Landscape Management (FILLM)², that takes account of water, biodiversity, climate and soil health in an integrated manner. FILLM recommends that disciplines and organisations responsible for water and environmental management work together to address Ireland's 21st Century environmental challenges in an integrated and co-ordinated manner to achieve synergies and co-benefits whilst maximising resource efficiencies.

An Fóram Uisce has identified a number of priority issues with the draft Strategy which will be addressed in sub-sections below.

PRIORITY ISSUES FOR SUBMISSION

1. Consultation Process

An Fóram is concerned with the lack of direct notification of this public consultation process, despite the interrelationship that exists between agricultural activities and water quality. An Fóram Uisce is the only statutory body representative of all stakeholders with an interest in water quality, providing a key platform for engagement on aspects within the draft Strategy pertaining to the protection of water from agricultural pressures.

Furthermore, the duration of this consultation process is not sufficient to allow for adequate public and stakeholder engagement on three significant documents, the draft Agri-Food Strategy 2030, the Strategic Environmental Assessment Environmental Report and the Appropriate Assessment Natura Impact Statement. There is also a lack of clarity on which of these documents are under consultation, along with how the input from the public consultation will be considered for the final documents. The technical nature of these documents together with the character limit and limited assistance provided in the online consultation form, do not adequately provide for the complexities and challenges of meaningful public engagement. Finally, there is an apparent lack of consumer involvement in the consultation process, despite the role consumers have on the food market and the focus within the Strategy on consumer trust and market opportunities.

2. Governance and Policy Coherence of the Agri-Food Strategy 2030

An Fóram Uisce welcomes the proposal within the draft Strategy for "a whole-of-government approach", page 15. However, An Fóram recommends strengthening this proposal with a more transparent, integrated, and participative approach across Departments within Government. Currently the Strategy provides direction for collaboration between the DAFM and the Department of

² The Water Forum, "A Framework for Integrated Land and Landscape Management," 2020. [Online]. Available: <https://thewaterforum.ie/app/uploads/2021/03/TWF-FILLM-Report-Feb21-v9WEB.pdf>.

Health, but lacks details on integration with other Departments. The draft Strategy omits any reference to an explicit role by the Department of Housing, Local Government and Heritage (hereafter, DHLGH), despite the DHLGH's role in implementing Ireland's River Basin Management Plan of the EU Water Framework Directive, which is a specific focus of Mission 1, Goal 3.

An Fóram supports the integrated approach outlined in Mission 1, Goal 1; "A Climate Smart, Environmentally Sustainable Agri-Food Sector by 2050, encompassing emissions, carbon sequestration, biodiversity, and water". An Fóram is also of the view that these components of our natural environment are interlinked and interdependent.

In 2020, An Fóram Uisce adopted the Framework for Integrated Land and Landscape Management (FILLM), as the overarching framework for not only catchment management, but also environmental management, (see additional document attached), or downloaded at this link: [Framework for Integrated Land and Landscape Management](#). The FILLM encourages multidisciplinary and multi-organisational approaches, as well as environmental policy coherence, policy integration and policy implementation. An Fóram's view is that the national Agri-Food Strategy would similarly benefit from the conceptual framework provided by FILLM, as a means of optimising efficiency and effectiveness in achieving environmental outcomes for climate, biodiversity, water quality and soil enhancement. FILLM aligns well with the approach adopted in the Strategic Environmental Assessment (SEA) of the Environmental Report, where all actions of the draft Strategy are assessed for a series of sustainability topics (Table 6.1 SEA Environmental Report). This SEA approach should not only be used to identify potential impacts of the proposed actions, but also used as a tool to highlight where actions are multi-disciplinary and multi-organisational in nature.

While the draft Strategy outlines the importance of coherence with national policy (Page 14), more detail on how the Strategy will align with existing EU legislation would be welcomed, including the EU Green Deal, the Biodiversity Strategy, the Farm to Fork Strategy, the Water Framework Directive and the UN Sustainable Development Goals. While a number of EU policies are introduced in a section under 'EU Collaboration' on Page 22 and in 'the Policy Environment' section on Page 39, the Strategy lacks detail on how it will actively align or cohere with them. The targets and objectives within these EU policies in relation to climate and the protection of water and biodiversity, highlight the myriad of challenges farmers are facing over the coming decades. This over-arching national Agri-Food Strategy should explain how it will align with these EU and national policies, how the sector will have to evolve in the immediate future and how farmers may be impacted by these changes. For example, the EU Biodiversity Strategy requires that 30% of all land will be protected for nature conservation by 2030, with 10% of land under strict protection. Due to the significant changes that will be required in land management in Ireland under the EU Biodiversity Strategy, more focus and clarity is needed on how this will be integrated into the national Agri-Food Strategy.

Ireland is legally required to implement the EU Water Framework Directive; the draft Strategy should therefore discuss how it will align with Ireland's River Basin Management Plan, which sets out Ireland's legal requirements to meet the EU Water Framework Directive, particularly relevant to Mission 1, Goal 3. Consequently, the Strategy would benefit from more emphasis on communication and collaboration with agencies that have a leading role in the River Basin Management Plan, such as the DHLGH, the Environmental Protection Agency (EPA), the Local Authorities Water Programme (LAWPRO), Agricultural Sustainability Support Advisory Programme (ASSAP) and Teagasc. All have a shared goal of protecting Ireland's environment and biodiversity and therefore new relationships should be developed to share responsibility and support the implementation and monitoring of the Agri-Food Strategy 2030.

3. Public Money for Public Goods

An Fóram Uisce is concerned with what is referred to as the ‘balanced approach’ in the Strategy which aims to address emissions, carbon sequestration, air, biodiversity and water quality (Mission 1, Goal 1), while also improving the ‘competitiveness and productivity of the primary producers’ (Mission 2, Goal 1). An Fóram is concerned that the ambitious environmental targets proposed in Mission 1, can only be realised if the socio-economic implications of the associated actions are adequately addressed.

An Fóram recommends clarification within the Strategy around the concept of productivity, as to whether it has a volume or value focus. Where the Strategy proposes the production of premium products, An Fóram recommends the focus is on *environmentally* premium products, where the competitive advantage is on clean food production, upholding Ireland’s ‘green reputation’. An Fóram welcomes the approach to create value-add in food (Mission 3, Goal 3) and suggest that the Strategy pursues high-value productivity rather than volume, to ensure the environmental targets of Mission 1 are achieved.

In 2019, through research commissioned by an Fóram Uisce on ‘Optimising Water Quality Returns from the Reform of the CAP’³, An Fóram adopted the “public money for public goods” principle.

A *pure public good* is available to all, i.e. non-excludable, and one person's consumption does not reduce another person's consumption, i.e. non-rival (Samuelson, 1954⁴, 1955⁵). An example of a public good is the environment, given its capacity to provide ecosystem services or natural capital. Where a pressure, such as pollution, has a negative impact on a public good, such as water or air, the loss suffered by one person from the pollution does not reduce the loss suffered by another. Therefore, the public money for public goods principle, indicates that public money should be used to balance any pressures, ensuring equilibrium in the public good.

In this instance, public money for public good would mean that support would be given to farmers to transition from chemical-based agriculture to more environmentally sustainable agriculture as required by the EU Green Deal, thereby having the potential to benefit farmers economically while protecting and enhancing public goods such as air, water, soil and biodiversity. Alternatively, this type of transition could be considered for the Government’s Just Transition Fund, whose objective is to support innovative projects that contribute to the economic, social and environmental sustainability.

DAFM’s recent Results-Based Environment Agri Pilot Project (REAP) received applications from five times the limit of participants, illustrating the willingness of the farming communities to transition to sustainable farming. An Fóram urges the Government to support a new level of funding for the protection of public goods (water, air, soil and biodiversity), under the principle of public money for public goods, which would support the implementation and associated socio-economic impacts of the environmental actions outlined in Mission 1 of the Agri-Food Strategy. Furthermore, an Fóram

³ Larkin, C. “Optimising Water Quality Returns from the Reform of the Common Agricultural Policy (CAP): A Rapid Assessment Report,” An Foram Uisce, 2020.

⁴ Samuelson, P. (1954) 'The Pure Theory of Public Expenditure', *Review of Economics and Statistics*, 36, 387-9.

⁵ Samuelson, P. (1955) 'A Diagrammatic Exposition of a Theory of Public Expenditure', *Review of Economics and Statistics*, 37, 350-56.

recommends that any action proposed in Mission 2 that requires changes in land management, for example an increase in productivity or diversification, is preceded by careful consideration of the current environmental status of each site. Site specific land characterisation incorporated into future planned land use change, will support assessments of suitability, such as carrying capacity, and help to mitigate impacts on the local river catchments, ecosystems and/or biodiversity. This, along with cross-departmental collaboration, will ensure informed decision-making and support coherence with national and EU policy.

4. Monitoring and Implementation Framework

This section also applies to Pages 134 to 139 of the Strategy and to Section 8 of the SEA Environmental Report, starting Page 131.

An Fóram recommends that the responsibilities of various departments and agencies who have roles in implementing, monitoring and reviewing the Strategy, should be included as a Table in this section. While the draft Strategy proposes the publication of a separate document “with actions and their owners, deliverables and timeline for implementation” after the final Strategy is published (Page 139), an Fóram recommends that it is instead included in the main document to promote ownership, shared responsibility and transparency within the Strategy. An Fóram believes that while DAFM have a leading role in implementing the Strategy, this is difficult to reconcile with a responsibility for monitoring and reviewing the environmental impacts. Monitoring of and reviewing environmental impacts would best be carried out by an independent agency, such as the EPA.

An Fóram Uisce agrees with the proposal that “an environmental sub-group should be established to oversee monitoring, review and reporting of environmental issues”, Page 139. It recommends that this group includes representatives from the DHLGH, the EPA and LAWPRO which would build on existing national resources and expertise in environmental monitoring. This would support integration of the Strategy with Ireland’s River Basin Management Plan and the Strategy’s proposal for a “whole-of-government approach”, deliver transparency and support ‘green credentials’.

An Fóram recommends that all data collected during monitoring and review of the Strategy should be available to all departments within Government and made publicly available. This would help establish trust and transparency in the Strategy but also further illustrate Origin Green credentials.

An Fóram recommends the inclusion of a sub-section within the ‘Monitoring and Implementation Framework’ chapter, to outline how the Strategy will facilitate public and stakeholder engagement to support the implementation and monitoring process. Effective stakeholder engagement, supported by scientific evidence will allow for the effective co-design and co-delivery of actions and policy modifications that are required to develop the Agri-Food Sector, while taking necessary steps to protect climate, air, water and biodiversity.

5. The Agri-Food Strategy and Water Quality

Mission 1, Goal 3 is to “Protect high status sites and contribute to achieving good water quality and healthy aquatic ecosystems, as set out in the Water Framework Directive”. An Fóram Uisce welcomes the inclusion of a specific goal within the Strategy which focuses on water quality and aquatic ecosystems, along with ambitious targets to reduce nutrient losses to water by 50% by 2030. As mentioned earlier, An Fóram is however, concerned with the lack of detail of how these targets will be achieved.

An Fóram recommends that the title of Mission 1, Goal 3, is changed to “Protect all water bodies and contribute to achieving good water quality and healthy aquatic ecosystems, as set out in the Water Framework Directive”.

This goal should not only address high status sites (which the current title suggests) but should also address deteriorating trends in water quality in water bodies identified as ‘at risk’ from agricultural activities. While an Fóram acknowledges that agriculture is not the only pressure causing deterioration in many catchments, for example point source pollution from urban wastewater treatment plants is also a major contributor to water quality deterioration, the Agri-Food Strategy should have a clear plan to tackle pollution sources in all water bodies which are impacted by agricultural activities.

During the implementation and subsequent monitoring of Mission 1, Goal 3; An Fóram recommends multi-stakeholder collaboration with the EPA Catchment Unit, LAWPRO, ASSAP and Teagasc for all actions within Goal 3 (not only Action 4 as is currently in the Strategy). An Fóram recommends maximising use of available guidance and resources to support this Goal; for example, the use of the EPA’s Pollution Impact Potential (PIP) maps⁶, which encompass physical settings and nutrient loadings and illustrate potential critical source areas for agricultural diffuse nutrients on farmland in the catchment areas of water bodies. These PIP maps could be used to support site assessments for intensification, identify areas where more action is required to reverse water quality deterioration and to develop effective mitigation actions to intercept nutrient pathways between critical source areas and watercourses, supporting Action 4 “Support Right Measure Right Place”. A recent report by the EPA Catchment Unit⁷ on the assessment of catchments that require nitrogen reductions could support Action 1 of this Goal, which addresses diffuse losses of nitrogen. The use of EPA PIP maps could also directly support Action 2 of Goal 3, to map “nutrient profiles at a field scale to support balanced soil specific nutrient advice in order to reduce nutrient losses to water”.

An Fóram Uisce recommends the addition of 3 new actions to Goal 3;

- (1) Protect drinking water sources from agricultural pressures. This action could include education on actions to support drinking water source protection. While Action 3 of this Goal proposes to reduce the risk of pesticides from agriculture, it does not address other risks to drinking water, such as nitrates and microbial pathogens.

⁶ <https://www.catchments.ie/next-generation-pollution-impact-potential-maps-launched/>.

⁷ <https://www.catchments.ie/assessment-of-the-catchments-that-need-reductions-in-nitrogen-concentrations-to-achieve-water-quality-objectives/>.

- (2) Protect bathing waters from microbiological contamination from agricultural activities; The 2020 EPA Bathing Water Report⁸ indicate 37% of bathing water pollution incidents in 2020 were due to diffuse pollution from agriculture. While Fóram members acknowledge that urban wastewater is the most significant threat to bathing water (causing 47% of bathing water incidents in 2020), agriculture is a significant threat which should be addressed in this Strategy. This action could target education and awareness around agricultural pressures on local bathing water quality and the development of site-specific mitigation actions in at-risk catchments.
- (3) Education and Awareness on Ireland’s new River Basin Management Plan and the Water Framework Directive. This could include education on the agricultural pressures on water quality and aquatic ecosystems, the benefits of integrated catchment management and differentiating between potential impacts of different types of farming, supporting the current Action 4 “Support right measure right place”. Farmers should have easy access to information on source protection and pathway interception measures to protect local water courses. Education on water conservation in vulnerable catchments would also be beneficial.

Finally, in relation to Mission 1, Goal 7, to “strengthen Origin Green”, an Fóram welcomes the proposal that the Strategy will “adapt to a higher level of environmental ambition”. However, an Fóram recommends that clear criteria for the protection of water quality must be included as part of this process, which currently only has a metric for water quantity.

6. Education, Awareness and Training

An Fóram Uisce welcomes the Education actions in Mission 4, including “updating of education and training programmes to meet the changing needs of the sector and emphasises the importance of lifelong and peer-to-peer learning”, along with “best practices in environmentally sustainable farming”.

An article in the Farmers Journal from May 2021, described a recent DAFM, Results-Based Environment Agri pilot survey of 1500 respondents⁹ (of which 80% were farmers); 50% said that agri-environment training helped them recognise and understand environmental issues on their farm, where two-thirds of the farmers believed more training would help improve the environment on Irish farms.

An Fóram recommends that Goal 4 is expanded to include agri-environment training, and re-skilling and education initiatives to support the transition to sustainable farming. An Fóram acknowledges that education and training campaigns will require additional resources, and while the Strategy proposes to utilise the Agricultural Knowledge and Innovation System (AKIS) under the Common Agricultural Policy, further additional support will be required by the Irish Government. An additional goal in Mission 4 could include;

1. Agri-environment awareness training and upskilling in pro-environmental measures.
2. Education initiatives for upskilling for different types of sustainable farming.

⁸ <https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/bathing-water-quality-in-ireland-2020-.php>

⁹ <https://www.farmersjournal.ie/two-in-three-farmers-believe-more-green-training-needed-618830>.

3. Increased training for farm advisors, including consultants and those based in Teagasc, as a means of expanding the work of ASSAP in supporting farmers to adopt sustainable farming.
4. Understanding catchment management and the whole farm approach, identifying co-benefits for national and EU legislation and objectives.
5. Create an avenue for shared learning across farms for good environmental practices which support stakeholder and community engagement.
6. Education and awareness which is designed not only for farmers, but also policy makers and stakeholders to support co-creation of actions for sustainable farming.
7. Education and training of the new CAP Strategy to support farmers transition to results-based payments.
8. Training in the use of EPA Pollution Impact Potential (PIP) maps.

7. The Agri-Food Strategy and the Circular Economy

While an Fóram acknowledges the transition to the circular economy within Mission 1, Goal 6, which is to “embed the agri-food sector in the circular economy”, it is recommended that the role and contribution of water to the circular economy needs to be further promoted, at least at certain catchments with water deficits, according to the recent National Water Resources Plan (NWRP)¹⁰. This is in line with the whole-of-environment approach where every component must be seen as one system, contributing to the circular economy, a key objective for sustainable future.

In the context of the circular economy An Fóram is concerned that the economics of food production in Ireland may be impacted by the increasing costs and reliance on imported synthetic fertiliser over the coming decades. An Fóram recommend that an additional action should be added to Mission 1, Goal 6, to include the recycling of non-toxic phosphorus and nitrogen from municipal wastewater for use as a fertiliser, which would also support the reduction of nutrients from municipal sewage treatment systems. Sustainable phosphorus management is already being highlighted within Europe due to concerns over a future global supply shortage of recycled fertilisers to meet growing consumer food demand^{11,12}. An Fóram acknowledges that this will involve collaboration with Irish Water and Government departments and it is welcomed that Dublin’s Wastewater will soon be recovering phosphorus as Struvite.

8. Public Consultation on the SEA Environmental Assessment Report

An Fóram Uisce welcomes the methodology of the strategic environmental assessment (SEA), where proposed actions of the Strategy are assessed against a series of sustainability topics, which include air, climate, water, biodiversity, soil, health, and others. This integrated approach is welcomed by An Fóram as it not only assesses impacts of the Strategy but also highlight co-benefits across different themes and improves cross-sectoral collaboration.

An Fóram is however concerned with some of the results from the SEA outlined in Table 6.1, where a number of actions which could cause environmental impact, e.g. Action 3 and Action 14, are not being addressed until Q2 of 2022, when a detailed plan to manage the sustainable environmental footprint of the different sectors will be developed. An Fóram recommends that the development of this plan

¹⁰ <https://www.water.ie/projects/strategic-plans/national-water-resources/>.

¹¹ <https://ec.europa.eu/environment/consultations/pdf/phosphorus/EN.pdf>

¹² <https://www.phosphorusplatform.eu/links-and-resources/p-facts>

to reduce these potential impacts should be considered a matter of urgency and instead developed as soon as possible.

In relation to Section 4, Table 4.1, which outlines relationship between this Strategy and other Plans or Programmes; the River Basin Management Plan is cited as EPA, 2018; this was published by the Government (DHLGH), not the EPA. While this is listed in this Table, there is no other reference to integrating the national RBMP into the Strategy. An Fóram recommends that the Strategy should specifically outline how it will adhere to the objectives of the national River Basin Management Plan.

An Fóram welcomes Section 7 of the Environmental Report, which sets out mitigation measures to minimise adverse effects of the Strategy's Missions. An additional approach to support future environmental assessments or the implementation of the Strategy, is through integrated modelling, which models the whole system in a holistic manner and could assess what actions will act at the expense of another, facilitating trade-offs where necessary, along with assessing resilience of the Strategy to extreme scenarios. Such an integrated monitoring-modelling approach, which could include the Strategy's environmental-social-economic functions, would require integrated databases, gathering information from all sectors (e.g. hydrogeological, soil, land use, atmospheric, social, economics, subsidies, production costs, trades, etc), emphasising a whole-of-government approach. Further technical information on this approach, along with supporting evidence from the literature is provided in Alamanos (2021)¹³ and Alamanos et al. (2017)¹⁴.

¹³ A. Alamanos and J. Garcia, "Balancing Phosphorus runoff reduction and farmers' utility: An optimization for Lake Erie Area," in *64th annual Conference of IAGLR (International Association of Great Lakes Research)*, 2021.

¹⁴ A. Alamanos, P. Stålnacke, S. Xenarios and N. Mylopoulos, "Integrated Water Resources Management in Agro-economy using linear programming: the case of Lake Karla Basin, Greece," *European Water Journal*, vol. 60, pp. 41-47, 2017.