



**IFA Submission to  
The Department of Agriculture, Food and the Marine  
Draft Plant Health & Biosecurity Strategy**

**19<sup>th</sup> September 2019**

**Submission by:**

**Pat Farrell  
Grain & Horticulture Executive  
Irish Farmers' Association  
Irish Farm Centre  
Bluebell  
Dublin 12  
Email: [patrickfarrell@ifa.ie](mailto:patrickfarrell@ifa.ie)  
Phone: 01 4260389**

## Introduction

The Irish Farmers' Association (IFA) is the main representative body for farmers in Ireland with over 75,000 members. It is a largely voluntary structure and comprises committees representing all of the major commodities, which include forestry, grain and horticulture. In addition, the Irish Hardy Nursery Stock Association (IHNSA), which is the representative body of nursery stock producers, is a commodity sector within the Horticulture sector of the IFA.

IFA welcomes the opportunity to present a submission re. The '*Public Consultation on the DAFM Plant Health & Biosecurity Strategy*'.

The arable, forestry and horticulture sectors by their nature are very diverse and complex, compared to the more main stream livestock sectors in Ireland. This strategy is a comprehensive roadmap in attempting to address all the issues which exist or may arise across the plant focused sectors.

Ireland's forestry and horticulture sectors are worth over €1 billion at the primary producer level. When the tillage sector is added to this figure it brings the total to over €1.5 billion, which represents a significant proportion of the value of Irish agricultural production. It is imperative that DAFM prevent the ingress or import of plant pests, diseases and invasive weed species into the country which would undermine these vital sectors.

Due to the increased focus on plant-based diets, issues around climate change, the need for more local sourced animal feed and diversification in Irish agriculture, a well-resourced plant health and biosecurity strategy will underpin the potential of the forestry, horticulture and tillage sectors.

Ireland must also capitalise and monetise its existing plant health status in areas such as EU protected plant health zones for plants and high-grade potato seed.

### 1. Does this strategy address your views around Plant Health and Biosecurity?

In general, the strategy addresses our views around Plant Health and Biosecurity and in the headings below there are some comments and observations on the topics and issues raised in the draft document.

**Plant Protection Products:** Obviously, the most important issue in relation to Ireland's plant health and biosecurity is the prevention and ingress of pests, diseases and invasive weed species. However, it is just as important that Irish forestry, crop and horticulture producers have access to a full range of plant protection products (PPPs) in order to combat threats. The toolbox of PPPs is continually diminishing and therefore discussions on plant health and biosecurity cannot be held in isolation to the access to necessary PPPs.

On this basis it is encouraging to see the strategy has referred to the link between plant health policy and policy on control measures and the work of the EPPO in this area. It is imperative that the DAFM is

engaged in this process as detailed in the document. In this respect Irish growers need to retain the full range of Plant Protection Products currently available. In addition, the DAFM need to authorise any necessary new active ingredients as they become available.

**Protected Zones:** Ireland, due to its island status, is almost unique in having 22 protected zones for certain plants. It is essential that these are retained, not only for biosecurity on this island but as a country we must capitalise on the marketing and export opportunities which this offers. The UK has very strict phytosanitary standards and these will probably become stricter under a hard Brexit scenario. Ireland's protected zones will give Irish plant exports an advantage under any new situation.

**Official Controls:** The new Plant Health and Official Controls Regulations outline the need for member states to have adequate phytosanitary and scientific capacity to ensure preparedness to respond to plant health threats. This is welcome however it must also be coupled with targeted financial resources at individual producers in order to prevent and eradicate potential plant health related problems. In Italy for instance the region of FRIULI-VENEZIA GIULIA was granted state aid in order to implement control measures aimed at the pest *Halyomorpha halys*.

For example, in relation to the issue with ash die back disease nursery producers were forced to destroy ash trees but yet there was no government compensation to do so. In the future producers need to be compensated for the destruction of plants which are part of official controls legislation. This will not only help affected producers to stay in business but will encourage them to report plant health issues promptly to the authorities. As we know compensatory schemes already exist in relation to animal health such as TB eradication, therefore similar schemes could be implemented for plant diseases.

**Invasive weed species:** There is some mention of the threat of invasive weed species in this document. They are a major threat to the main cereal crops in particular, but also to the general flora in the countryside. Two of the more serious threats are those presented by blackgrass in tillage enterprises and Japanese knot weed. More must be done to prevent the ingress of weeds such as blackgrass into this country by way of machinery, straw, seed etc.

In the case of blackgrass more resources must be targeted to raise awareness of the problem in order to limit its spread. In relation to Japanese knot weed there has to be more coordination between the different government departments and local authorities who have a responsibility in dealing with invasive weed species.

**Seed Sector:** Ireland has a designation as a "High Grade Seed Area" for potato seed which means it incorporates additional higher plant health standards for seed than other parts of the EU. It is extremely important that this is retained along with the testing for the potato diseases mentioned in the strategy. As mentioned, in relation to our protected zone status for plants, more resources need to be committed

to this area in order to capitalise on our superior plant health credentials in this area. Ireland only produces approx. 200ha of seed potatoes per year and we aren't even close to being self-sufficient. Apart from the immediate threat of Brexit regarding the import of seed, Ireland needs to exploit the potential for exports in the sector.

Similar to seed potatoes, Ireland also produces cereal seed to a higher specification than required by the EU, which is very important to the economics of our cereal sector. Again, it is important that these standards are retained and that the sector is well resourced.

**Adaption of new technologies:** In order to deal with plant health and biosecurity, the agriculture and horticulture sectors need access to all available technologies that would enable producers to combat the challenges posed. An example of such technology is that provided by CRISPR-Cas9, which is a genome editing tool that enables geneticists and medical researchers to edit parts of the genome by removing, adding or altering sections of the DNA sequence. This facilitates development of improved plant strains and varieties that can cope with any new pests, disease and invasive weeds.

**Biomass:** Due to the focus on the use of renewable fuel resources, Ireland is now importing increased amounts of biomass. It is included as a major risk as part of the new EU Plant Health Directive. Therefore, it is essential that sufficient checks are imposed on imports of biomass particularly from 3<sup>rd</sup> countries.

**Awareness:** DAFM has increased its input into awareness campaigns in order to highlight the risks to plant health from the importation of plants. This needs to continue and more resources need to be committed to this area, particularly to target landscape contractor's, the general public, retail and the buyers of plants online.

## 2. What needs to be further considered?

**Cooperation:** There must be more cross departmental cooperation to ensure that everyone understands the risks to plant health and the consequences to the general economy. Local authorities must also be included particularly when it comes to issues such as invasive weed species.

The cooperation that exists between the authorities in Northern Ireland and DAFM must continue. The importance of this cooperation and communication was demonstrated in relation to dealing with the situation relating to the Epitrix issue in potatoes imported from Spain.

**Advisory:** Teagasc need to dedicate more resources to the Horticulture and Tillage sectors, both at advisory and research level. This would not only help to identify and find solutions to plant health and

biosecurity issues, but they would also liaise with producers and the industry on the ground, to raise awareness and identify potential risks well in advance.

**Funding:** The draft strategy, has in general addressed the issues concerning plant health and biosecurity, however it is essential that the plant health section is sufficiently resourced in order to carry out all of the suggestions and requirements identified. DAFM must not only implement the statutory requirements demanded by the EU but must go a step further to protect the uniqueness which Ireland's island status affords it from a plant health perspective.

The Investment Scheme for Commercial Horticulture and the Tillage TAMS needs to be retained, and future funding increased, in order to provide financial support for any measures which producers need to adopt to improve their plant health and biosecurity status.