IFA submission

to the European Commission's Roadmap regarding the Farm to Fork Strategy

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Introduction

As Ireland's largest farming representative organisation, the Irish Farmers' Association (IFA) is making this submission to support farm incomes and contribute to further environmental sustainability while ensuring equivalency of standards are a central part of the future development of the Farm to Fork Strategy. IFA is a member organisation of the European farmers' representative organisation COPA-COGECA. We make this submission in addition to their submission to the Farm to Fork Strategy consultation.

Farmers in Ireland continue to demonstrate their commitment to addressing farm level sustainability challenges, as demonstrated by the following actions:

- Over 250,000 carbon assessments have now been completed on farms, as part of Bord Bia's Origin Green programme. No other sector of society in Ireland has shown this level of commitment to identifying measures to addressing the climate challenge.
- In addition, 90% of Ireland's beef exports are now in an audit and carbon foot printing programme and 100% of milk production is in a carbon auditing cycle. Therefore, Ireland is truly unique, being the only country in the world that measures, monitors and manages carbon from farm to fork, at a national level.
- Over 40% of all farmers in Ireland participate in GLAS - the Green Low Carbon Agri-Environment Scheme, which makes a positive difference for the climate, water quality and biodiversity. As part of this scheme:
    - Almost 13,000km of watercourses will be fenced off from livestock.
    - Almost 46,000ha of biodiversity rich traditional hay meadow will be planted.
    - Almost 240,000ha of carbon sequestering low-input permanent pastures will be created.
    - And 360km of arable grass margins, as well as 62km of riparian margins will be created.

  These are real and tangible improvements that can be built upon, by the Irish Government re-opening the GLAS scheme to new entrants. Also, a new environmental scheme with a minimum payment to farmers of €10,000 should be introduced.
- On air quality, several hundred farmers continue to make applications for part-funding under the TAMS Low Emission Slurry Spreading Equipment Scheme, to support the financing of technologies including the trailing shoe.

Despite the fact that the average farm income in Ireland is less than €24,000, farmers are prepared to continue to invest to safeguard the environmental integrity of their farm businesses.

The Farm to Fork Strategy presents some considerable challenges to farming in Ireland, which can be addressed by adopting the measures outlined below.

Assessing the impact of proposals in the Strategy, to ensure balanced regulation

Good legislation is legislation which is properly scrutinised, in advance of being introduced. Any measures proposed as part of a Farm to Fork Strategy must include a detailed Regulatory Impact Assessment (RIA) before any political or regulatory decisions are taken. For example, proposals in the Strategy to reduce pesticide and fertiliser use will have a serious consequence for the production output of European farmers. This is important because at the currently the global population continues to grow however little progress is being made to address malnutrition and global feed stocks remain tight. In addition, all measures proposed in the Strategy must be scientifically based, using the best available technologies and not based on sentiment.

Ensuring equivalency of standards

Any reduction in output and income for farmers derived from the delivery of this Strategy must be compensated for by additional Common Agriculture Policy (CAP) funding. The European Union must also demand equivalent environmental, animal welfare and phytosanitary standards from 'third' countries exporting into the EU as they demand of Irish and European farmers. Cheaper substandard imports into the EU cannot be used to displace premium European produce. It is also important that European farmers receive a fair price for food from the market, above the costs of production.

Addressing challenges with organics

In relation to the conversion of land to organic production, the impact of the resultant drop in production must be assessed. In addition, the costs of production can be higher for organic farming, which again may not be reflected at retail level. In Ireland we have seen the retail price of organic produce dropping to equivalent prices paid for non-organic produce in the recent past. This trend is been repeated elsewhere, which can leave organic farming unsustainable.

Financing the delivery of the Farm to Fork Strategy

Current proposals to reduce the multiannual financial framework (MFF) budget and thereby the CAP budget is not compatible with the ambitions of the Farm to Fork Strategy. To delivery on the objectives of the Strategy there must be no reduction in the CAP budget. This budget must be increased to take account of the additional asks on farmers and to take account of inflation and protect farmers basic payments and the farm schemes within the Rural Development Programme.

The market place must reward high standards

The Farm to Fork Strategy must provide direction to the market place that high food production standards of European farmers matter and must be paid for. This is currently not happening, for example recent data shows that in Ireland from Jan 2010 to Jan 2020 consumer prices rose +7.4% while retail food prices

fell -9%, poultry prices fell -17.1%, pork prices declined -7.7% and beef prices +0.2%. If European citizens are seeking higher standards, then farmers are entitled to a fair return (margin over cost of production) and this Strategy must be used to delivery this through initiatives such as banning the below cost selling of food produce.

Food labelling to support balanced diets

A balanced diet is a key measure to support a healthy lifestyle and reduce obesity. The Strategy must be used to support greater communication of and awareness of the Food Pyramid, which is designed to support healthy eating by getting the right amount of nutrients – protein, fat, carbohydrates, vitamins and minerals, fibre including from meat, dairy and vegetables, to maintain good health.

Climate action must be based on accurate measurement of farm-level activity

At present, the way methane is accounted for does not reflect the up to date science[1] and farmers are not getting credit for the carbon sequestrated in their pastures and hedgerows. It is essential that these issues are addressed in any Farm to Fork Strategy, to ensure that all emissions emitted and sequestered by the sector are to be fairly and accurately accounted for.

Using farm-level resources to improve efficiency and the circular economy

Farmers in Ireland continue to focus on improving efficiency and the circular economy, through voluntary programmes such as the IFA and Environmental Protection Agency run Smart Farming (www.smartfarming.ie) initiative. The Strategy can be used to support the further development of the circular agri-economy by seeking to amend the Renewable Energy Directive to compel Member States to introduce guaranteed export tariffs for farm scale and community based renewable projects such as roof-top solar and anaerobic digestion.

Ensuring welfare of animals is not impacted by changes to antimicrobial use

The policy of both the EU and national authorities in making vaccination a more economically attractive option in the anti-microbial resistance (AMR) matter, would assist farmers in building herd immunity to certain diseases and thus reducing reliance on microbials in the future. The IFA has continuously included proposals in submissions to the Department of Finance in Ireland to remove value added tax from vaccines in this regard.

In any strategy that aims to reduce the reliance of meat production on microbials, the economic costs that are associated with this change in practice must be recognised by the entire food chain. It must also be recognised that farmers were, in the past, advised by professions to use increasing volumes of antibiotics, especially in the intensive pig and poultry sectors, in order to increase overall output. This was primarily driven by the economic pressure of having to produce more to stand still. This fact is clearly

[1] Allen, M.R., Shine, K.P., Fuglestvedt, J.S., Millar, R.J., Cain, M., Frame, D.J. and Macey, A.H., (2018) *A solution to the misrepresentations of CO_2-equivalent emissions of short-lived climate pollutants under ambitious mitigation.* npj Climate and Atmospheric Science, 1(1), p.16.

seen in the reducing percentage of disposable income that is spent on food today by EU citizens, compared to any time in the past. While all farmers take their responsibilities in producing safe food very seriously and not reducing the efficacy of available human medicines in the process, food production is a business. Farmers must be assisted in every way in responsible use of microbials with alternatives and preventive treatments, such as vaccinations, and organic acids treatment of water, being financial incentivised.

Also addressing AMR requires a multi stakeholder approach in the agri sector, vets are only one of a number of service providers and advisory institutions that have a role to play. The professional competence and judgement of the farmer is fundamental and must be recognised and supported in addressing AMR in the Strategy.

Supporting aquaculture's positive climate and biodiversity roles

Ireland's aquaculture sector is worth over €150m, at the farm gate and it also has an important climate and biodiversity role to place in the delivery of the Farm to Fork Strategy.

Consideration and appropriate recognition must be given to the role of the aquaculture industry as a carbon efficient source of sustainable protein. Aquaculture provides for one of the most carbon efficient sources of protein, when there is an increasing demand globally for sustainable sources of protein.

Aquaculture also contributes to the control of nitrogen/phosphorous removal as shellfish are filter feeders which aids to reduce and mitigate eutrophication effects of Irish coastal waters. Shellfish, as filter feeders, actually increase water quality and habitat quality in Irish coastal waters. Shellfish provide a nutrient removal service through feeding which enhances bacterial denitrification, sedimentation rates, reduces turbidity as well as contributing to nutrient sequestration.