



# Submission by Chambers Ireland to the Department of Agriculture, Food and the Marine regarding Statement of Strategy 2023-2026

March 2023



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## About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

Our Network has pledged to advocate for and support the advancement of the United Nations Sustainable Development Goals (SDGs). Accordingly, we use the Goals as a framework to identify policy priorities and communicate our recommendations. We have a particular focus on five of the goals encompassing Decent Work and Economic Growth (SDG 8), Sustainable Cities and Communities (SDG 11), Gender Equality (SDG 5), Industry, Innovation and Infrastructure (SDG 9) and Climate Action (SDG 13).<sup>1</sup>

As an organisation with the SDGs at the heart of our operations, we welcome the fact the Department aims to enable and regulate the sector with an emphasis on social, economic and environmental sustainability. This is ever more important considering the reality that, generally, despite significant investment in the common agricultural policy and other relevant EU policies, agriculture's contribution to biodiversity loss, water overconsumption and greenhouse gas emissions continues. Irish agriculture is uniquely positioned to assist our country reaching our overall greenhouse gas emissions reduction targets.<sup>2</sup> An essential part of the new Strategy, therefore, should focus on encouraging the sector to become more sustainable.

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<sup>1</sup> The Chambers Ireland SDGs. Available at: <https://www.chambers.ie/policy/sustainable-development-goals/chambers-ireland-sdgs/>

<sup>2</sup> According to the Environmental Protection Agency, agriculture the single largest contributor to Ireland's overall greenhouse gas emissions, at 37.5%. <https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/latest-emissions-data/#:~:text=In%202021%2C%20the%20energy%20industries,overall%20emissions%2C%20at%2037.5%25.>



## Key Points

- We welcome the fact the new Strategy will be prepared having regard for the external environment in which it operates and its ability to adapt to change, such as the implementation of the CAP Strategic Plan, the cost-of-living crisis, Climate Change, Digitalisation, the war in Ukraine, and the impact of Brexit.
- Particular regard should be given to the possibility of implementing a carbon market for agriculture, especially with regard to afforestation.
- There should be a focus on aligning the work of the Department to ensure the Strategy enables the sector to meet the aims of the Biodiversity Strategy 2030, and our Climate Action Plan.
- The Department should work with the Department of Enterprise, Trade and Employment to examine ways for agricultural producers and manufacturers to take advantage of schemes for geographical indications of origin.
- Digitalisation should be facilitated and encouraged by the Strategy to align with the goals of the National Digital Strategy, and increase administrative efficiency.
- The new Strategy should continue to prioritise trading opportunities with EU and third country markets, with an emphasis on promoting the unique qualities of Irish products.



## Questions

### **How could the Department's services to the agri-food, forestry and marine sector be further enhanced?**

Digitalisation will be key to modernising and increasing the efficiency of Department and its services to the sector. To do this, investment will need in Information Communication Technology (ICT) services if the Department is to be able operate efficiently and effectively while also ensuring that targeted incentives deliver the behavioural change that the sector needs to deliver. This was referenced in the previous Strategy (Strategic Objective 5.2), and we support its inclusion in the new Strategy. Digital literacy may need to be prioritised, which would also involve a technology refresh programme similar to that referenced in the old Strategy. This will not only improve customer service, rather it will also aid accountability and controls across the Department.

Collaboration with other Departments should be maximised. Firstly, the Department of Enterprise, Trade and Employment should be engaged with to design and implement strategies for Irish agricultural manufacturers and producers to take advantage of schemes for geographical indications of origin, this is outlined in more detail later in our submission. Secondly, the Department should increase its cooperation with the Office of Public Works to develop plans for energy efficiency improvements and greenhouse gas emission reductions by 2030.

The current Strategy for the Department mentions sustainability as a key component of its functioning. However, we emphasise that sustainability should not merely refer to environmental sustainability; rather it must also account for social sustainability. Accordingly, we support the inclusion of Strategic Objective 5.1 from the 2021-2024 Strategy, which aligns with our support of Gender Equality (SDG 5). We believe it is important the Department develops a workforce that is highly skilled, diverse and gender balanced.



Regarding the marine sector, the Department should ensure that migrant fishing workers are adequately compensated and that their labour rights are not infringed upon.<sup>3</sup> Currently, there are numerous cases of migrant workers reporting exploitation by employers, which severely impacts Decent Work and Economic Growth (SDG 8) within the sector, while also undermining our international reputation in targeted growth markets. Monitoring and reporting structures should be in place to adequately investigate and prevent instances of exploitation while also facilitating recourse to compensation where necessary.

### **What forthcoming market and other challenges should the Department prioritise?**

The ongoing war in Ukraine has no definite endpoint in sight, and the economic effects arising from the war will need require contingency planning. We therefore believe that production costs will continue to fluctuate, meaning that fertiliser, feed and fuel prices will lead to an overall increase in agriculture input costs. In this context the establishment of the National Fodder and Food Security Committee is a welcome development as part of the Department's response to the crises in feed, fodder, fertiliser and other agricultural inputs. Similarly, the Rapid Response Team should continue to function in its role in monitoring the impacts on agri-food supply chains.

The Department urgently needs to place climate adaptation at the centre of its resilience planning and also embed climate adaptation as part of future planning. This will require innovation, and the examination of practices in other jurisdictions that have successfully managed to do so. However, this need not be a weakness, and should instead be seen as an opportunity for the Department in becoming a leader in pioneering and implementing innovative practices which not only are environmentally sustainable on paper but provide practical, economic incentives for smallholders to transition to carbon-neutral practices. As outlined previously, there is an urgent need for the department and the industry to act on climate, given agriculture's inapposite contribution to our national greenhouse gas emissions. In our view, the establishment of an

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<sup>3</sup> <https://www.theguardian.com/global-development/2021/oct/20/plight-of-migrant-workers-on-irish-fishing-boats-exposed> ; <https://www.thejournal.ie/hands-on-deck-trafficking-5933827-Dec2022/>



audited carbon sequestration market would be useful for the agricultural sector, including the forestry sector. Further details as to how this could be implemented, and why this is important is detailed elsewhere in our submission.

**Are there opportunities, new developments, or innovations that the Department should consider when developing the 2023-2026 strategy which would advance the achievement of our mission, vision, and objectives across the agri-food, forestry, and marine sectors?**

The Department should consider the development of a strategy to help Irish producers and manufacturers stand out internationally. For food producers, this can be done via existing schemes for geographical indications of origin for food. Similarly, the geographical indication scheme which is planned for crafts should also be utilised, once this comes into effect.<sup>4</sup>

The Department also has a central role to play in managing the State's resources to help meet our climate goals. We are optimistic that the Department will look to the potential of our forestry and wetlands in achieving the objective of becoming more climate-friendly. Namely, the Department should examine the potential environmental and economic gains to be attained through establishing a carbon sequestration market for agriculture. In addition, as Coillte accounts for 7% of the States's land,<sup>5</sup> part of a wider forestry sector, that altogether manages approximately 11% of Ireland's land, the Department should have a central role in developing 'landscape as a service' which can help compensate farmers for land usage changes which offer services to the wider community, e.g. securing clean water supply, mitigating and preventing downstream flooding events, and using land as a carbon sink.

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<sup>4</sup> [https://single-market-economy.ec.europa.eu/industry/strategy/intellectual-property/geographical-indications-craft-and-industrial-products\\_en#:~:text=For%20craft%20and%20industrial%20products%2C%20each%20EU%20country's%20competent%20national.products%20using%20such%20a%20name.](https://single-market-economy.ec.europa.eu/industry/strategy/intellectual-property/geographical-indications-craft-and-industrial-products_en#:~:text=For%20craft%20and%20industrial%20products%2C%20each%20EU%20country's%20competent%20national.products%20using%20such%20a%20name.)

<sup>5</sup> <https://www.coillte.ie/aboutus/ourstory/#:~:text=About%20Coillte,largest%20provider%20of%20outdoor%20recreation.>



## Helping Irish industry trade and compete in global markets

The Department should work with the Department of Enterprise, Trade and Employment in further promoting trade for Irish agricultural products. Emphasis should be on the quality of the products involved; e.g Donegal tweed, or Irish Grass Fed Beef, so that these products are not competing on price as commodities, but are instead recognised as the premium products which they are. To do this, we strongly urge the Department to consider the worth of geographically-linked products which are verified under EU legislation.

The faith shown in geographically-linked products in countries like Italy and France results from the fact that producers are assured that their products bearing the logo are subject to strict controls. This is in turn good for consumers, who can be assured that registered products bear the characteristics which they pay a premium for.

This presents a real opportunity for lagging craft industries such as the wool trade, where sheep farmers, for example, often have to pay for the disposal of high-quality wool as a result of the decline of the domestic yarn industry. It also constitutes an opportunity for more indigenous food products to be considered for geographically-linked status.

A strategy should be put in place by the Department, in collaboration with the Department of Enterprise, Trade and Employment to engage with business operators, and draft a strategic plan for such products which a) focuses on the uniqueness of indigenous food products and crafts, b) ensures that applications by business operators have the substantive scientific backing and administrative capabilities to withstand scrutiny by EU authorities.

Currently, Italian products with protected status far exceed the number of protected Irish food products.<sup>6</sup> Ensuring the same does not happen for Irish crafts will necessitate a serious undertaking by both Departments, with action plans to mirror the ambition shown by our Italian counterparts.

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<sup>6</sup> <https://www.tmdn.org/giview/gi/search>





## Developing a carbon sequestration market

The Department ought to examine establishing a carbon market in relation to forestry and wetlands, as currently, forestry is not included in the EU Emissions Trading Scheme.<sup>7</sup> Here, the idea is that soils farmed in a regenerative manner act as a carbon sink, this removes carbon dioxide from the atmosphere. In return for switching to regenerative, sustainable practices, new carbon markets which provide a financial incentive to shrink the sector's carbon footprint would allow farmers to get paid for the carbon they store by companies that want to offset their emissions.

Generating carbon credits in this manner will entail measuring the baseline capacities of farms for carbon sequestration. Once calculated, suitable farming practices must be adopted to safeguard soil carbon accrual over time. In the context of forestry, the preference would be to have native forestry plantations which are suitable for the land and biodiverse. More generally, other carbon-smart agricultural practices include growing cover crops, crop rotations, anaerobic digesters, and conservation tillage. The carbon credits would then be awarded to farmers when sequestration is proven to happen over a certain timeframe. Companies could then purchase credits to account for the sequestered carbon against their own emissions and goals.

The development of a carbon market will be key to promoting land management practices which support carbon sequestration. If carefully regulated, monitored closely and implemented cautiously, a carbon market could result in meaningful reductions in our carbon output and increased afforestation right across the country. It will be important to monitor uptake under the new Strategy and engage with farmers on potential barriers to accessing funding. However, investment in the forestry sector will only happen with adequate and easy access to funding and support.

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<sup>7</sup> [https://ec.europa.eu/clima/eu-action/eu-emissions-trading-system-eu-ets\\_en](https://ec.europa.eu/clima/eu-action/eu-emissions-trading-system-eu-ets_en)



In an economic context, the establishment of a carbon market would help relieve some pressure on the State to provide income supports to farmers and also others that are contingent on Ireland's agricultural production being environmentally sustainable. This is because the credits-based system would be traded by companies to smallholders, as they will have an incentive to offset their carbon footprint and risk incurring fines.

### **Forestry and landscape as a service**

The Department ought to build on the new draft forest strategy, and promote the use of land as a service. In this context, forests and wetlands can play a central role in protecting our water sources, supporting biodiversity, promoting tourism and improving the health and wellbeing of communities. In the context of waterways, forests have been proven to reduce the leaching of nutrients from agricultural soils, which can have a negative impact on the quality of water supplies in an area.<sup>8</sup> They can also help regulate floodwater and reduce soil erosion. Additionally, the economic value of native forests that are biodiverse should not be understated. In our submission on the draft forest strategy, we referenced the fact that 18 million people in total every year visit Coillte sites, which demonstrates the important role it plays in facilitating both domestic and international tourism.<sup>9</sup> This is an opportunity which could create greater incentives for farmers and other private landowners to invest in forestry and continue with the re-wetting of land where appropriate, and is one the Department should lead on.

### **Forestry as a carbon sink**

In our submission on the Draft Forest Strategy, we focused on how the State's forests can act as a carbon sink, and the role this will have in helping the State meet its climate targets as agreed under the Paris Agreement and European Green Deal.

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<sup>8</sup> [Environment - The importance of trees in Ireland - Teagasc | Agriculture and Food Development Authority](#)

<sup>9</sup> <https://chambers.ie/wp-content/uploads/2023/02/Chambers-Ireland-Submission-to-the-Department-of-Agriculture-Food-and-the-Marine-Regarding-the-Consultation-on-the-Draft-Forest-Strategy.pdf> Page 9



To optimise their potential as a long-term carbon sink and store, the Department must ensure that Irish forests are planned and managed effectively. This is proposed through wood product innovation and greater use of timber in house and commercial building, where carbon will be locked-in through long-life products for decades. However, of the 3.2m m<sup>3</sup> of roundwood produced in 2018, only 1.01m m<sup>3</sup> was converted into sawn wood. About 40% of the wood biomass in Ireland is burnt and the vast majority of our forestry exports flow into wood-based panels, paper, and particle board which are not likely to act as long-term carbon sinks.

To ensure the efficacy of Irish timber as a carbon sink, it will need to be monitored and reported on if we are to convince different industries to convert to using sustainably sourced wood, as opposed to using carbon-intensive materials. For this reason, we welcomed the commitment in the draft Forest Strategy to developing systems that will measure, record, track and optimise the storage of carbon in wood products. This should give different industries more confidence and conviction to alter their manufacturing processes.

### **What metrics should the Department use to measure our performance and monitor achievement of our strategic goals?**

Chambers Ireland have long-supported the implementation of the Sustainable Development Goals, and we welcomed their inclusion into the former Strategy. It was encouraging that the Department committed to encouraging an agri-food sector that is 'environmentally, economically and socially sustainable, in line with the SDGs'. However, more Goals should be implemented into the new Strategy, and not just the five listed in the old Strategy (Zero Hunger, Responsible Consumption and Production, Life Below Water, Life on Land, Partnerships for the Goals).

We welcome the fact that the SDGs are being promoted and given a greater role in informing the policy priorities of the Department in the new Strategy. However, the Sustainable Development Goals should not be seen as independent from each other; rather their purpose is to highlight how every area of life impacts other areas. As an example, farming has a role to play in maintaining our water purity and Clean Water and Sanitation (SDG 6) is a Goal which farming has



an enormous impact upon<sup>10</sup> as agriculture is both the primary polluter of fresh water supplies, and is the sector with the greatest water usage<sup>11</sup>. The effect, however, of nitrates and slurry waste in conventional farming on our waterways has been detrimental to those ecosystems, and our own water supply. Realistically, the Sustainable Development Goals should be a challenge which, if accomplished, lead to desired, defined, changes in behaviour. The goals that the Department has selected to focus on seem to have been selected not because they challenge the Department and the industry to move us from an unsustainable path of action, but rather, these goals have been selected because they will have the least impact on the Department's policy trajectory.

The Sustainable Development Goals ought not be seen as being a superficial box-ticking exercise for organisations to adhere to. The Department ought to incorporate goals which will prioritise early action on sustainability, because delaying action not only increases the damage we are doing (and so increases the costs of remediation that will eventually need to occur) it also leads the sector towards maladaptive investments and therefore will severely impact the economic sustainability of the sector over the medium to long term.

The department should reconsider its approach to the Sustainable Development Goals, and reengage with them in a way that treats them holistically. In particular, Goal 13 (Climate Action) is a notable omission from the previous Strategy and should be included in the new Strategy. Similarly, we call for the inclusion of the following Goals in the new Strategy, to help guide the Department and measure the achievement of its aims: Goal 6 (Clean Water and Sanitation), Goal 8 (Decent Work and Economic Growth) (particularly in relation to workers within the primary industries who come from outside of Ireland) and Goal 9 (Industry Innovation and Infrastructure) which would help the policy perspective to become more forward looking.

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<sup>10</sup> <https://www.irishtimes.com/news/environment/farming-practices-and-climate-change-affecting-irish-river-water-quality-1.4676698>

<sup>11</sup> <https://www.teagasc.ie/environment/water-quality/agriculture-and-water-quality/>



The risk for the sector, therefore, is that by only incorporating SDGs in a piecemeal manner, such as focusing on the Zero Hunger Goal (SDG 2) we may spend years attempting to improve productivity rate in beef production while continuing to disregard the impact of the sector on Clean Water and Sanitation (SDG 6). Should we ignore the effect the industry has on the environment we will incorrectly miscategorise unsustainable actions as sustainable practices. This will lead members of the farming community and the Agri-Food industry to commit to investments in response to the market structure which the department is promoting, which will take decades pay off, but are likely to change in response to the increasing variability of our climate.