

13<sup>th</sup> March 2020

**Roadmap on Farm to Fork Strategy**  
**Submission by the Irish Cooperative Organisation Society**

The Irish Co-operative Organisation Society (ICOS) is pleased to provide its feedback on the roadmap for the new Farm to Fork Strategy on Sustainable Food.

ICOS is the umbrella body for over 130 co-operatives in Ireland – including the Irish dairy processing & milk purchasing co-operatives, livestock marts and other rural based enterprises – whose associated businesses have a combined turnover in the region of €14bn, with some 150,000 individual members, employing 12,000 people in Ireland, and a further 24,000 people overseas.

As co-operative enterprises, we operate across the food supply chain, from the farm, through to processing and packaging of products, and delivery to consumers. The nature of the co-operative business model roots us in our local communities and empowers us to work with a long-term perspective. **We firmly believe that the co-operative model is the most appropriate business structure to enable sustainable growth in the sector while providing farmers with an opportunity to own and directly benefit from new opportunities.**

We therefore share the high ambitions of this proposals to enhance the sustainability the food value chain, with a focus on innovation and competitiveness; to support, economically and socially, farmers and fishermen and increase their resilience to climate change; to provide safe, nutritious, quality assured, and climate friendly food for a growing global population; and protecting the natural environment in which we operate.

**The Irish agri-food sector is willing and preparing itself for the collective, intense effort to ensure climate targets are achieved, biodiversity is enhanced and animal welfare is maintained to the highest possible standards.**

**However, this cannot be achieved without the provision of appropriate levels of support- both financial supports for the sector and investment in new research to guide advisory services and develop new technologies.** The resources to achieve the ambitions laid out in the roadmap have not be identified. In addition, the current proposal to significantly reduce the CAP budget, which is the central support for farmers to address these challenges and enabled invest in sustainable practices and production is completely out of sync with the targets outlined. If we truly believe in the ideals listed in the farm to fork strategy, we need to commit the resources to achieving them.

### **A Certified Sustainable Food Chain**

In Ireland, we have a fully developed sustainability programme which encompasses the full food supply chain, Origin Green. This initiative, developed by Bord Bia (the Irish Food Board) in 2012, in collaboration with the Irish agri-food industry, is open to all food business operatives, from farmers, to manufacturers, retailers and foodservice companies. It provides all of these businesses with a common standard with which to measure and guide improvement of their sustainability performance.

Farms are members of Origin Green through Bord Bia's Sustainability and Quality Assurance Schemes. Each farm is audited by an independent auditor every 18 months and is assessed for compliance against the criteria outlined within the respective standards. Membership is voluntary however there is near to full compliance in the dairy and beef sectors.

For food businesses, members are required to set targets in the areas of sustainable sourcing, resource efficiency, and social sustainability. Achievement of these targets is independently audited and verified by Mabbett, a recognised global certification company.

Tackling food waste is also a core pillar of the programme. It is designed to ensure agri-food producers, manufacturers, retailers and food service businesses give high priority to food-waste prevention throughout the food chain through dedicated mandatory targets for all members.

Implementing this programme and ensuring continuous compliance, as targets evolve in line with societal expectations, has required significant investment, on farm and within businesses. However, its independent audit process, systematic approach and the inclusion of key sustainability criteria have been essential for us as an industry in meeting customer needs and become a partner of choice globally for sustainably produced dairy and beef products.

**These achievements and the substantial steps which have already been taken by the industry to fulfil the aims of the Farm to Fork Strategy must be recognised and be supported within the Commission's proposal to ensure their continued success.**

### **Reducing Pesticide, Fertiliser and Antibiotic Use**

To achieve sustainability, efficiency is key. Pesticides, fertilisers and antibiotics are among the main tools used by farmers to achieve efficiency. They are needed to protect crops, feed and animals, to ensure the quality of produce and to enhance yields to provide affordable food for consumers.

ICOS and its members fully recognise however the significant threat to human and animal health posed by Antimicrobial Resistance (AMR) and we are committed to assisting the decrease of antibiotics usage in the dairy and livestock sector. We equally recognise the need to safeguard biodiversity and soil and water quality from inefficient or over use of pesticides and fertilisers.

We believe, however that a specific quantified or percentage reduction target in pesticide, fertiliser and antibiotic use is an ill-fitting tool to achieve a sustainable, efficient agri-food sector and in some cases could be contradictory to good agricultural practice. For example, while some areas may be overusing fertilisers, other areas are severely lacking in nutrients. In fact, in Ireland, sampling shows that 84% of soils are deficient in nutrients in some way. Equally, while certain practices regarding antibiotic use in farmed animals should be, and are being, phased out, ensuring proper antibiotic supply to animals is essential to preserve animal health and food quality standards.

**Therefore, the objective of this strategy must rather be to ensure the "responsible use" of inputs, with targets based instead on increasing the percentage of production using decision-support and precision farming tools. These tools help to ensure the correct use of inputs and can lead to an overall reduction, but most importantly, they allow for increased efficiency without over-use.**

## **Animal Welfare**

First and foremost, ICOS believes that it is important to acknowledge that Ireland's farmed animal population have a high welfare status. This is in part due to our grass based, extensive production system operated in Ireland. This system of grass based, family run, small to medium farming operations is instrumental both to our productive efficiency and high animal health and welfare status.

Animal welfare is an unquestionable priority for our members across the entire livestock sector. Dairy co-operatives in particular, proactively engage with their members on animal welfare issues and provide a range of extension and support services, including advice and education regarding breeding options and calf rearing, to ensure high quality of life for all animals.

We also wish to highlight that the trade and movement of animals, within Ireland, across the border with Northern Ireland, and indeed globally is an integral part of our livestock production and provides the basis on which our dairy and beef sectors operate. Livestock marts offer Irish farmers an important alternative outlet to market their livestock in an increasingly restricted market place. Additionally, the live export of animals is a necessary outlet for Irish farmers, given domestic price pressure and limited alternatives.

**Any new animal welfare standards must ensure the continued availability of these key market outlets for Irish farmers, in adherence with high traceability and animal welfare standards.**

## **Organic Farming**

Currently 8% of EU agriculture is produced under organic farming practices. Further increases in this are possible, however such changes must be market driven, in order to ensure a sustainable, fair income for the farmers producing organically and protect their investment through market return.

There are other production methods however which provide other or additional benefits from the perspective of animal welfare, sustainability and human nutrition, for example pasture-based livestock farming. These other production methods must not be overlooked within this strategy and equally supported.

## **Promoting healthy and sustainable diets**

ICOS supports the development of new and innovative policy options to encourage the consumption of healthy and sustainable foods. Ultimately, the location of carbon emissions is irrelevant to the climate, it is therefore logical to actively encourage and support food production in regions where it is proven to be less harmful to the climate.

**Mandatory national origin labelling of food products (thinking particularly of dairy products and dairy and meat ingredient products) is however not a legitimate tool to achieve this. Such a measure would only encourage protectionist member state behaviours, to the detriment of the functioning of the EU single market, consumer choice and the environment:**

- Introducing mandatory national origin labelling within the EU undermines the purpose and operation of the EU single market. Basic food safety and quality requirements are the same across the EU and therefore mandatory origin labelling would not bring any health or safety benefits. From this perspective, if labelling is required, it is a rather “EU/Non-EU” labels which should be utilised. Such labelling takes into account of our common market, regulations and production standards.
- National origin labelling has also been shown time and time again to be less important to consumers in comparison to factors such as taste, price, convenience, etc, including within the Commission’s own research. Rather consumers ask for further enhancement in product quality and health benefits. Mandatory origin labelling could lead to higher costs, a reduced product range and less competition and innovation, all of which goes against consumer interests.
- In the range of dairy, and dairy and met ingredient products currently available to consumers, products of a specific origin are already offered, through the voluntary origin labelling system. Voluntary origin labelling, allows for origin labelling to be used where appropriate, feasible and easy to prove within the normal systems of controls. This voluntary system more adequately responds to consumer demands than a one-size-fits all mandatory origin labelling scheme.
- National mandatory origin labelling would not promote consumer selection of more sustainable or climate friendly products. As already stated, the location of carbon emissions is irrelevant to the climate, we need to instead promote climate efficient production whatever EU country it is from.

**In the development of guidance or policy relating to the promotion of sustainable and healthy diets it is vital that consideration is made not only to the impact of foods on the climate and biodiversity, but also what is culturally acceptable, assessible, affordable and importantly, nutritionally adequate.**

The principle that a sustainable diet requires the consumption of less animal products must be challenged. While animal products and by-products, including dairy, do often have a higher carbon footprint than for example grains or vegetables, they are also much more nutritionally dense. In addition, they contain vital nutrients, such as calcium and vitamin B12, which are difficult to replace. Overall, the importance of a varied and realistic diet, with consideration for cultural traditions and social norms, must be front and centre when developing any new policies.

**The sustainability of products should not become mixed up with marketing standards.** Marketing standards determine the basic compositional requirements of a product. Their goal is primarily to ensure that all products fulfil certain minimum criteria, thereby guaranteeing a level playing field. The carbon footprint of a litre of milk can vary a lot between different production methods but it should always be considered a milk when discussing a product derived from an animal. Rather other, supplementary tools and schemes could be used clarify the performance of the product according to various sustainability criteria.

## **Research & Innovation**

Innovation is a key driver of long-term growth and sustainable development.

There are several exciting initiatives within the Irish agri-food sector aimed at fostering innovation and enhance sustainability, such as Food for Health Ireland (FHI) and Teagasc Moorepark Technology Ltd. However, that said, further improvement in innovation and collaboration is needed if we are to achieve the ambitious goals laid out in the Farm to Fork strategy.

A particularly critical area of innovation in the current context, is in the circular and bioeconomy. These are key components for achieving a low carbon and resource efficient agri-food sector and must not be overlooked within this strategy.

The publication of the new European Circular Economy Action Plan and Bioeconomy Strategy is a welcome development to support further research and action in this area. However, to build on this, these strategies must be aligned with the incoming Common Agricultural Policy, EU Invest programme and Horizon Europe, in order to leverage the necessary funding to achieve their strategic aims, to create networks and to develop awareness, education and skills within industry and among primary producers.