

Introduction	1
Why organic?	2
Providing Multiple Public Goods	2
Biodiversity	4
Climate	4
Viability	5
Rural regeneration and gender.	5
Market	6
Concerns	6
New opportunities	6
The need	7
Production Policy	7
Extension services	8
Advocacy	8
Distribution supports	8
Processing	8
Can it be done?	8
Denmark	8
Austria	9
France	9
Eco-Schemes	9
Eco-schemes in ireland	10
Four Packages of Measures	10
New approach to Scrub and new Agroforestry Scheme	11
Recommendations Organic	11
Recommendations Eco-schemes	11
Recommendations Scrub and Agroforestry	12

Introduction

I'm Dr. Oliver Moore. I lecture in the [Centre for Co-operative Studies in University College Cork](#). My PhD is in applied rural sociology, with a specialisation in organic farming and food. I am also Communications Manager with [ARC2020](#), a European think tank on agri-food policy matters, in particular CAP. I'm on the board of the Irish Environmental Network and the Cloughjordan Community farm. The following is my task:

“The Committee have agreed to conduct this analysis with the Agriculture Sector which accounts for 35% of Ireland’s total emissions. Within this, the Committee are also seeking to explore the state of Ireland’s biodiversity, its relationship with climate mitigation and adaptation and the potential use for nature based solutions. The Committee is particularly interested in hearing from you the challenges facing the state and the policies that the Committee should be advocating in order that we achieve our targets.”

I take this opportunity to focus on three areas which have the potential to significantly improve Ireland’s overall agri-food performance, with regard to climate change mitigation, adaptation, biodiversity and indeed other public goods. These are **organic farming, eco-schemes and scrub/agroforestry**.

- Comprehensive new **Organic Action Plan (OAP) for Ireland** in line with the EU Green Deal (EGD) ambition and the newly launched EU Organic Action Plan (EOAP), building on best practices from other EU Member States and regions
- **CAP Strategic Plan** - achievable and impactful **eco-schemes** to help farmers transition towards more sustainable practices, including towards organic farming.
- New approach to **scrub as eligible land** and new **Agroforestry scheme**

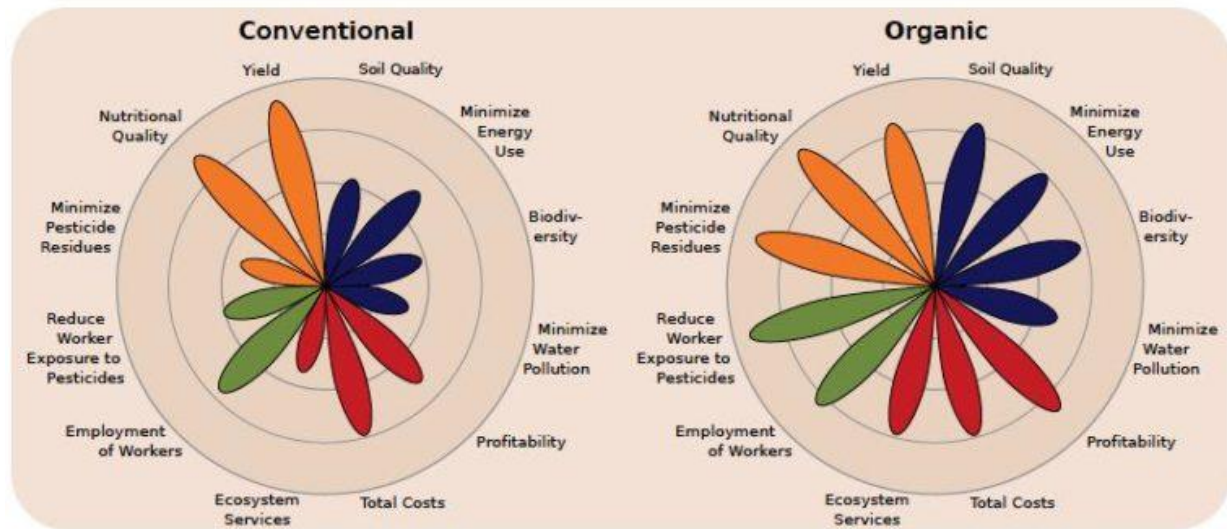
Why organic?

Providing Multiple Public Goods

Organic can be described as a brilliant all-rounder in the delivery of public goods. The latest organic regulation ([Regulation \(EU\) 2018/848](#)) states that “organic production is an overall system of farm management and food production that combines **best environmental** and **climate action practices**, a high level of **biodiversity**, the preservation of **natural resources** and the application of **high animal welfare standards** and high production standards in line with the demand of a growing number of consumers for products produced using natural substances and processes.” The terms and conditions of the [OFS 2021 states](#): “The overall objective of this Scheme is to deliver enhanced environmental and animal welfare benefits and to encourage producers to respond to the market demand for organically produced food.”

Elsewhere in Department documentation (e.g. [Value for Money review of the Organic Farming Measure](#)) “the very highest welfare standards of farmed animals” and “reduced risk of AMR (**Antimicrobial Resistance**)” are cited.

The [2014 Value for Money Review of the Organic Farming Scheme](#) (pg. 36-37, The most recent available) from the Department of Agriculture cites [Kasperczyk and Knickel \(2006\)](#) who “summarized the absolute and relative impacts of organic farming The findings emphasise the **enhanced environmental benefits** of



Biodiversity

Evidence on biodiversity in particular is strong, including in Irish dairy. (See research by Jane Stout and colleagues [for organic vs conventional dairy in Ireland](#) regarding biodiversity, and interestingly, [on farmer attitudes to and knowledge of biodiversity](#). More recently, research from Finland found just how good organic extensive grazing is compared even to actual [biodiversity measures](#). It found organic livestock farming to be the only CAP supported agri-environmental (AES) measure to correlate with higher wild bird numbers (Santangeli et al 2019) Researchers used six years of data on 46 bird species from the Finnish landscape. They found that organic livestock farms support both migratory birds and insect-eating birds. Of all the supposed biodiversity-boosting farmland measures supported by EU via the Common Agriculture Policy, organic livestock farming was the only one that significantly correlated with higher numbers of wild birds. Meta-analysis have for some years found organic farming to perform better on the biodiversity metrics, for example [Hole et al 2005](#) and [Bengtsson et al 2005](#). Hole et al 2005, for example analysed 76 peer-reviewed research papers, and found that in 66 cases, across all categories of plants and animals and soil, organic performed better. In 2021, the EU organic Action Plan averages it out as 30% better biodiversity performance overall for organic.

Climate

In climate terms, organic farming's performance depends on whether there is [a per kg or per hectare approach taken](#). However, if we want to start reducing our absolute, overall emissions, as Ireland must do, then organic farming, with its better per hectare performance, is a good, workable option. Per hectare, the lower stocking rate and lack of mineral fertilizer enables lower GHG emissions. Organic practices such as an emphasis on both clover and mixed species swards also helps with climate change adaptation.

Viability

Overall viability (especially via lower costs and other variables, see [Clavan 2010](#) and various Teagasc organic demonstration farm reports - [according to Teagasc](#): “When comparing organic dairy farms to conventional systems, profit per cow and per litre is often much higher on organic farms, but on a per hectare basis, is average or lower.” What this means is that with a nitrates derogation, conventional dairy farms can outcompete organic, but only with this additional aid, and aid that is being removed in Denmark and the Netherlands - both strongly agri-food producing nations. Organic farm viability needs to be further supported to be optimised, as there are, with sheepmeat and to a lesser extent beef, price pressures and leakage into the conventional sector. However in a context of a coming carbon budget, and possible carbon border adjustment mechanism impacts on imported mineral fertilizers, as well as tightening rules on animal welfare, pesticides and more, organic is more in line with overall sustainability due diligence requirements. A European Commission DG Agri study from 2019, which [compared six different EU countries](#) on various metrics, including yield, and profitability, found organic compared favourably, even on yield and profitability, in dairy. Improved research and development investment for organic, as well as enforcement of environmental regulations, can close the gap when applied.

Rural regeneration and gender

Using OECD (2016) data the [EU Biodiversity Strategy](#) (pg 8) states that “Organic farming in particular holds great potential for farmers and consumers alike. The sector creates jobs and attracts young farmers. Organic farming also provides 10-20 % more jobs per hectare than conventional farms, and creates added value for agricultural products” The EU OAP (page 3) [states](#): “Organic farming can also boost social sustainability in various ways and support the development of rural areas, in line with the upcoming Long-term vision for rural areas, as well as that of coastal areas. It can provide possibilities for young farmers and help foster equal access and equal income between women and men in the sector. Studies show that organic farming offers women farm entrepreneurs an easier entry-point than the conventional sector. Organic farming has to inspire conventional farming and lead the way.” Though up-to-date data is difficult to find, [a study conducted](#) for the European Commission (2016) found, using 2013 data, that “farmers younger than 55 represent 61% of the organic sector whereas they represent only 45% of the conventional sector”. Organic can thus synergise coherently with the targets in the recently announced rural policy [Our Rural Future](#).

Market

Ireland suits organic due to our clean green image, the length of our grazing season, and the fact that we are agri-food exporter to EU markets that increasingly want it.

European Markets and EU policies are increasingly aligning with organic. Some retail chains *only* take organic in some EU countries (e.g. Biocoop France; Biomark Germany), market in general is growing, and doing so faster than conventional market. French and German markets are now worth more than €20

billion annually, and there is a gap in Ireland (unlike many EU member states) between supply and demand which favours increasing supply, as the latest [FIBL statistics](#) suggest.

Concerns

Nevertheless, organic in terms of land area in Ireland, is a laggard. Ireland has one of the lowest shares of organic farmland in the whole of the EU (1.6% of the UAA in 2019 – 26 out of 27 Member States just above Malta). Ireland has an organic action plan, but it is both [unambitious and is likely to fail to significantly grow the sector](#).

- New data sourced this month by this author shows that the Department of Agriculture dedicates about E15 million of [E1.8 Billion](#) to organic farming. Bord Bia dedicates about 2% of its budget to organic food promotion according to recent communication with Bord Bia. Bord Bia states: “work is currently underway on a new research project to identify future opportunities for Irish organic produce”. In a context of a 5% (2020) or 7.5% (2030) target for organic Utilisable Land Area (UAA), this is clearly far too low.
- We fail to meet our targets (e.g. 5% UAA by 2020) and also fail to adjust policies.
- We don't even allocate underspent money to the OFS [when we can](#) (e.g. GLAS TAMS, Genomic) or other organic-specific supports when we can.
- Practically difficult for [current conventional dairy to convert to organic dairy](#) due to housing and other incompatibilities (more likely suckler to dairy)
- Leakage in sheep meat and to an extent beef sectors, some price tightening between organic and conventional (but see lower costs for organic).

New opportunities

Supports are emerging via the [EU Organic Action Plan](#). These include, in particular, supports for marketing and for R&D. Horizon Europe's “Agriculture, Forestry and Rural Areas” intervention will dedicate at least 30% of funds to “topics specific to or relevant for the organic sector.”

The need

A **comprehensive full agri-food system approach** to developing organics at policy, production, research, extension services, processing, distribution, advocacy and consumption ends. These must be done together and publicly so, to develop confidence in the sector. This should be coupled with the **levelling of the playing field** by fully complying with EU and national environmental law and targets in water quality, reducing absolute emissions, and more.

Production Policy

Dedicated 7.5% overall Department of Agriculture budget to organic farming by 2026 as 7.5% is the growth target. Reallocated spends where underspends happen. **Much [better funded OFS](#) (E520 per ha in conversion, E470 full symbol, as per IFA proposal but with ‘capping’ or degressivity over certain size; eg 60 ha) 20% higher for arable (E600 full symbol), 30% higher for horticulture (E700 full symbol).**

By EU standards, [payment rates in Ireland are low](#) (see section 3 from page 20) with countries paying up to E550 for grassland in conversion (Estonia); E450 full symbol grassland (Portugal); E800 in conversion arable (Slovakia) E900 full symbol arable; E1400 in-conversion horticulture (Denmark) E900 full symbol horticulture (Portugal, Belgium, Finland, Cyprus); E2100 in-conversion perennials (Denmark), E900-1000 full symbol perennials (Cyprus, Denmark, Estonia, Finland, Italy, Portugal).

Ireland, by comparison pays:

Horticulture In conversion: E300 Full symbol: E200.

Arable: In conversion E260 Full symbol: E170

All other: In conversion E220 Full Symbol: E170.

Organic farmers need either priority access to other agri-environmental schemes, or, if there is a risk of double funding, farm higher OFS payments.

Considering the range of public good organic farming easily delivers, payments need to be at least competitive with any comparable schemes, especially REAP. Importantly, no scheme reaches the level of public good delivery of organic farming, yet schemes applying *elements* of the organic farming method, with *no potential, distinct, market*, are sometimes funded a multiple of the funding for the OFS. What’s important here is that **there is no actual market for REAP food** - there is for organic, especially if developed properly. REAP will pay E250-400 per ha for [low input permanent grasslands](#) but there is no specific market for this produce). It is worth remembering that the previous REPS scheme was discontinued when the last recession hit, in part because it was a cost with no market output. The OFS should open yearly. Adjusted scoring metrics should incentivise direct selling to local markets and other public goods. Tax breaks and improved grants for organic businesses focused on key targets, such as local markets/import substitution/rural revitalisation should be provided. Plans to develop all organic sectors, including pork and poultry, should be developed.

Extension services

increase in number and range of dedicated extension workers Teagasc.

Research and Development fully access (build research consortia) new Horizon Europe opportunity which is almost 1/3 dedicated to organics in its agriculture stream. Better support the [National Organic Training Skillnet](#) (NOTS) including its request for delivering an Advanced Certificate in Organic & Biological Agriculture (Green Cert). Better support [Organic Growers of Ireland](#) (OGI) funded to further

develop apprenticeships; Develop 3rd level full qualifications in organic farming in Ireland, and more options in 3rd level courses (action 9 EU OAP). Support for dedicated producer groups and for transitioning EIPs; EIP for small to mid organic horticulture development. Development of organic seed sector in Ireland, in line with new organic regulation; pilot group certification initiative with organic producer group/co-op using blockchain paper trail via EIP as per new organic regulation provision.

Advocacy

IFA to have a full committee on organic (not just project). Dedicated campaigning, advocacy, coordinating and communication support for independent organic support organisation, and/or to supplement two main certification bodies (drawn from EU Organic Action Plan enhanced supports for underdeveloped organic member states)

Distribution supports

Mandated, rising levels of public procurement including organic lamb (following Danish model; no conflation with bord bia quality assured)

Processing

Support for mobile abattoirs; more flexible licencing local butchers and processing units; competition in processing sector; more supports for on-farm processing (some already in motion); synergise with new rural policy for developing food hubs with organic focus.

Market development: 7.5% of bord bia budget dedicated to organic food promotion at home and abroad. Surplus to be drawn from sources outlined in EU OAP action points 1 (bullet point 4) and 2.

Can it be done?

Yes. Irish authorities need to learn from best practices from [Austria](#), Denmark (mandated public procurement, see EU OAP), [France](#) (esp [Brittany](#) and [Normandy](#)). In all cases, the drive for change came from the top, as a policy imperative. Some examples are below.

Denmark

Organic public procurement rates of 60% nationally, 88% in Copenhagen. Method: policy in place to grow the route to market and then: capacity building for kitchen employees; food waste decrease; process food decrease; work with national wholesalers; mandated organic dimension to public tenders; integration into climate and other plans. (pg [176 of Fibl Organic World report](#).)

[Austria](#)

Strong emphasis on upland family farming and accessing EU market (Germany) upon entry to EU in 1995. Policy changes (numerous tax, planning and licencing breaks for establishing organic restaurants selling

own-farm produce, which encouraged development of fruit and nut based produce, even in dairy-based upland areas).

France

France is probably the most interesting to compare to Ireland for organic growth, including in dairy. Like Ireland, France is strongly agri-focused and 20 years ago, like Ireland, it was an organic laggard. However, following the lead of organic advocate and French Minister for Agriculture Minister Stéphane Le Foll (2012-2017), [France attempted a transition towards agroecology on the national scale](#), and, concurrently, large scale reductions in pesticide use. Organic farming and land area growth has been [phenomenal in recent years](#), the fastest globally, with 5000 farmers a year converting to organic. Price, public payments and supply chain investments are cited as helping drive [organic cereal growth](#) in France. Dairy has also grown, with rising (and publicly stimulated) consumer demand, emergence of producer organisations, development of regional feed crop supply and the decoupling of organic and conventional prices seen as part of the growth in [organic dairy](#). Especially comparable are places like [Normandy](#) and [Brittany](#) – these are strong dairy regions in France, with very strong growth in organics. 13% of the milk produced in Normandy is now organic, and both supports and supportive infrastructure are strong. Normandy has high rates of organic payments, tax breaks, emphasis on local direct sales and public procurement. But it takes political and institutional will.

Eco-Schemes

Eco-schemes will be an integral part of the new CAP, and Ireland's CAP Strategic Plan. Eco-schemes, part of farmer's pillar 1 payments, replace greening and have the potential to supplement income, especially for farmers on lower entitlements. They also have the potential to help farmers begin to transition towards organic farming.

There are concerns that the CAP trilogues, nearly complete, are weakening the ability to gather harmonised, coherent and consistent data for [monitoring and evaluation](#). Further the talks appear to be for the most part [further weakening conditionality](#) despite the Parliament's more [environmentally sound position](#). There is also concern that eco-scheme money will not be ring-fenced, and that the pressure for this is coming from Agricultural ministers in the trilogues. (For more see [CAP news here](#)). This would be a mistake - we need to use eco-schemes to fund the transition towards more climate and biodiversity friendly farming.

The following overarching objectives are required for eco-schemes to be robust.

- Priority should be given to impactful nature-based solutions - not to so-called precision-farming (a loose term to describe efficiency measures that could perversely increase the per hectare application of agri-industrial inputs such as fertilizer and pesticides while reducing the per kg application) or animal welfare. Both should be funded elsewhere
- The relationship between eco-schemes and conditionality and Pillar two agri-environmental and climate measures must be understood, logical and progressive. Eco-schemes must be more ambitious, but can be advancement upon, other initiatives.

- Eco-schemes results need to be measurable and results must be shown to improve over time, for options to be retained.
- Geographic bundling of options is optimal
- No eco-scheme should disimprove an existing environmental positive (e.g. clearing scrub to plant birdboxes)
- A points-based system needs its methodology to be both open to scrutiny and to prioritise/reward genuinely greener options.

Being one year (possibly multi-annual) schemes, eco-schemes should be **doable for farmers and impactful for the environment**. Professor Alan Matthews [lists some important considerations and options](#).

Eco-schemes categories in Ireland

Currently, the Department is considering four categories of eco-schemes:

1. Contribute to Climate Change Mitigation and Adaptation
2. Sustainable & Efficient Management of Natural Resources
3. Contribute to the protection of Biodiversity and enhance ecosystem services
4. Improve Animal Health & Welfare

The 4th - animal welfare - is **not suitable as an eco-scheme** and should be funded elsewhere.

1. Contribute to Climate Change Mitigation and Adaptation.

This includes extensive livestock; reduced chemical nitrogen inputs; catch crops and milk recording as proposals. Milk recording is not suitable, catch crops are when carefully planned, reduced Nitrogen is when accurately measurable, extensive farming should relate to high nature value area and also be measurable.

Recommendation: This latter option - extensive livestock - should relate to livestock reduction numbers for robust achievement of national emissions and pollution targets. Carefully managed catch crops are also acceptable as an eco-scheme.

2. Sustainable & Efficient Management of Natural Resources

Department proposals here are spring slurry spreading; Low Emissions Spurry Spreading (LESS); precision agriculture; excluding bovines from watercourses.

Recommendations

Spring slurry spreading is only acceptable if very carefully monitored and spaced out throughout the season; LESS technologies are supported elsewhere so justification is needed; precision agriculture should be funded elsewhere; Excluding bovines from watercourses is especially important for dairy farmers and should be accompanied by expanded riparian zones.

Recommendations - new proposals:

- Planting of multispecies swards on existing reseeded land not on semi-natural grasslands and there should be no incentive through this measure to reseed semi-natural grasslands. Indeed penalties should apply if they are lost.
- Measures to stop the release of carbon from soils (ie peatlands, drained soils etc) should be encouraged including drain blocking.
- Measurable reduce pesticide use.
- Transition to full use of composted farmyard manure organic.

3. Contribute to the protection of Biodiversity and enhance ecosystem services

Department proposals suggest: credit for existing habitats and hedgerows; planting groves of trees; hedgerow management, native corridors.

Recommendations.

For existing habitats and hedgerows the relationship to GAEC 9 needs to be clearly established, and ponds, wet grasslands, wetlands, wet flushes should also be listed. Overall focus should be on conservation of high value habitats. Wild bird cover strips could be included, but not on existing biodiversity rich habitats. Hedgerow management is fine; native corridors are a good suggestion and should not be treated with pesticides or fertilizers.

Recommendation - new proposal: retaining winter stubble on arable land. This can be good for bird populations and soil (carbon retention). Consideration should however be given for impact on livestock farmers and straw availability. See Environmental Pillar submission to Department of Agriculture for more.

To implement eco-schemes, the Department proposes to use a points based system – to give farmers flexibility while also rewarding those who are doing more for the environment. A farmer will select appropriate measures to meet points requirement (min 300 points) under the different packages to qualify for eco-scheme payment. A min of 75 points must be achieved in each of the three environmental packages, cross-compensation allowed for flexibility.

Overall measures that **encourage the reduction in fertilizer use and pesticides**, integration of catch crops and other soil or biodiversity protections, and **further enhance so-called enhanced conditionality** (e.g. **more ambitious GAECs** for landscape features, native woodlands etc) are optimal.

New approach to Scrub and new Agroforestry Scheme

There are promising signs that the new CAP will allow a proportion of land to have [scrub and still count as an eligible acre](#). From 2023, 30% of a parcel may consist of features beneficial to climate and biodiversity and may be considered eligible for payment. This could add 55,000 eligible hectares in the next CAP.

Carefully managed, this could lead to forestry regeneration and sustainably increase our very low levels of forest cover.

The [Agroforestry Scheme](#) provides support for just five years. This makes no sense when it comes to trees - 10 to 15 years is optimal. The replanting obligation of the Forestry Act needs to be relaxed so that farmers can be encouraged to try Agroforestry without being locked into trees forever on their land. Alley cropping and forest farming should also be encouraged in the Scheme. The [Joint Environmental Pillar, Stop Climate Chaos and SWAN agri-food policy document](#) calls for the introduction of “a full suite of agroforestry measures focused on a variety of species and a continuous cover management model to promote natural regeneration and ecological corridors for nature connectivity. Prioritise the protection and restoration of ecological corridors of linear native woodlands and hedgerows that connect existing fragments of semi-natural, native, and ancient woodlands.”

Recommendations Organic

- Far higher payment rates of about E500 per hectare for grassland systems, and proportionally more for arable (E600) and horticulture (E700) (or priority access to other agri-environmental schemes). Considering the range of public good organic farming easily delivers, payments need to be at least competitive with any comparable schemes, especially REAP. Importantly, no scheme reaches the level of public good delivery of organic farming, yet schemes applying *elements* of the organic farming method, with *no potential, distinct, market*, are sometimes funded a multiple of the funding for the OFS. What’s important here is that there is no actual market for REAP food - there is for organic, especially if developed properly. Yet the REAP scheme will pay E250-400 per ha for [low input permanent grasslands](#) without a dedicated market outlet.
- Scoring prioritisation for direct selling producers for entry to Organic Farming Scheme
- Immediate progress towards 7.5% of Bord Bia and 7.5% of Department of Agriculture budgets for organics, with 7.5% achieved by 2026. Support Drawn from the new EU Organic Action Plan, in particular Horizon Europe’s agricultural stream.
- New exchequer and EU Organic Action Plan funded, full spectrum organic advocacy organisation, with initial funding of E150,000 per year.
- Trial EIP for conversion to organic using blockchain technology to achieve group organic certification as per the new organic regulation. Roll out of this approach on a regional basis by 2026. Market alignment thereafter.
- Mandated, ring fenced and rising levels of organic public procurement with no conflation with Bord Bia Quality Assured, as has happened previously

Recommendations Eco-schemes

Contribute to Climate Change Mitigation and Adaptation.
Recommendations

- Extensive livestock option should relate to livestock reduction numbers for robust achievement of national emissions and pollution targets.
- Carefully managed catch crops are also acceptable as an eco-scheme here.

Sustainable & Efficient Management of Natural Resources.

Recommendations

- Spring slurry spreading is only acceptable if very carefully monitored and spaced out throughout the season;
- LESS technologies are supported elsewhere so justification is needed;
- precision agriculture should be funded elsewhere and not as an eco-scheme;
- Excluding bovines from watercourses proposals is especially important for dairy farmers and should be accompanied by expanded riparian zones.

3. Contribute to the protection of Biodiversity and enhance ecosystem services

Recommendations.

- For existing habitats and hedgerows the relationship to GAEC 9 needs to be clearly established, and ponds, wet grasslands, wetlands, wet flushes should also be listed.
- Overall focus should be on conservation of high value habitats.
- Wild bird cover strips could be included, but not on existing biodiversity rich habitats.
- Hedgerow management is fine;
- native corridors are a good suggestion and should not be treated with pesticides or fertilizers.
- New proposed eco-scheme here: retaining winter stubble on arable land. This can be good for bird populations and soil (carbon retention) See Environmental Pillar submission to Department of Agriculture for more.

4. Improve Animal Health & Welfare

This is not suitable as an eco-scheme.

Recommendations Scrub and Agroforestry

- Allow scrub to count as eligible acre, and use this to begin native reforestation.
- Lengthen and broaden the agroforestry scheme.