

Dr Ronnie O'Toole  
Indecon International Economic Consultants  
Indecon House  
4 Clyde Road  
Ballsbridge  
Dublin 4  
Ireland



Office of the Director General  
Headquarters, PO Box 3000  
Johnstown Castle Estate  
County Wexford, Ireland  
Y35 W821

T: +353 539160600

F: +353 53 9160699

E: [info@epa.ie](mailto:info@epa.ie)

W: [www.epa.ie](http://www.epa.ie)

Our ref: EPAC 20.22

26 July 2022

**RE: Implementation and Embedding a Reform Programme for the Better Regulation of Food in Ireland (To-Be Report)**

Dear Dr O'Toole

I refer to your communication received on 13 July regarding the implementation of the Food Safety and Food Authenticity Strategy and the proposed 'To-Be' Report on a reform programme for the better regulation of food in Ireland. Please find our responses below, which is focussed on the 'To-Be' report's ambition to describe the required 'ideal state' framework of economic, institutional and regulatory targets necessary to inform *'the broader 'future vision' for the Irish agro food sector in the medium and long term'*.

The EPA recognises that the agri-food sector is a core component of our national economy and society. We have had a long engagement with DAFM with regard to food safety through our role as the national reference laboratory for routine radiation monitoring in food products (including water). The EPA also has a role in the regulation of primary food production activities (e.g. intensive agriculture), in the regulation of GMOs, and in the regulation of activities such as meat and dairy processing. The EPA collaborates with DAFM on matters ranging from food waste, Animal By-Products, antimicrobial resistance, catchment management, landspreading, farm hazardous waste, land cover mapping, research, and greenhouse gas emissions.

The EPA also has a Memorandum of Understanding with the FSAI dealing with areas of mutual responsibility, shared expertise and shared interest such as monitoring, emergency planning and Research. The main areas of common interest between FSAI and EPA include, Water; Food; Soil Quality; Radiation, Packaging and Emerging threats with a current focus on the potential risks associated with the application of biosolids to land (landspreading).

The EPA publishes a State of the Environment Report every four years, the most recent of which was published in 2020. With regard to Agriculture we state that *"economic growth in the agri-food sector in recent years is happening at the expense of the environment, as evidenced by trends in water quality, emissions and biodiversity all going in the wrong direction. Business-as-usual scenarios will not reverse*

*these trends. New measures must go beyond improving efficiencies and focus on reducing total emissions by breaking the link between animal numbers, fertiliser use and deteriorating water quality.”*

It is clear from examination of the science that the environmental sustainability of the sector as a whole is largely not supported by the evidence: there are good actions at local level, but these need to be speeded up and scaled up. Agriculture needs to be able to validate performance around producing food with low environmental footprint.

The EPA believes that the environmental sustainability of the food sector in Ireland is fundamental to delivery of the necessary assurances in relation to the safety and authenticity of Irish food products. EPA has a number of observations regarding Food Safety and Food Authenticity<sup>1</sup> in Ireland that we would like to see addressed in any future regulatory solutions, as follows:

- Agricultural practices are identified in EPA reports as being one of the main pressures responsible for the decline in water quality nationally.
- The sector is responsible for approximately one third of national greenhouse gas emissions and are now 15% higher than the 1990 level.
- The sector is responsible for over 99 percent of national ammonia emissions and widespread implementation of ammonia reduction technologies in agriculture is needed for Ireland's compliance with EU Air Pollutant Reduction Targets
- The EPA has developed a system of performance-based indicators to rank industrial licensed sites in order of priority for enforcement. The National Priority Sites List is used to target EPA enforcement effort at the licensed operators with the poorest environmental performance. Five of the eight sites on the current National Priorities list are associated with the food sector. This has been a common aspect of previous priority listings too.
- The most recent national estimates indicate about 0.8 million tonnes of food waste is generated every year in Ireland. The food sector (primary production, processing and manufacture) is estimated to be responsible for up to 40% of this waste.
- VTEC (Verocytotoxigenic E. coli), a particularly dangerous form of E. coli can arise from contamination of a water supply by cattle slurry. Research has demonstrated that incidence of VTEC infection in Ireland is particularly associated with rural areas, with significant associations between cattle density as well as unregulated household wells.
- EPA is collaborating with the FSAI in relation to concerns surrounding the use of biosolids on food production lands (landspreading, POPs, AMR, contaminants of emerging concern, etc.). From food security and environmental protection perspectives the regulatory regime for these practices will need to address suitability and risk assessments, approvals, monitoring, reporting and controls.
- There is no national sectoral driven system for the management of farm hazardous waste (identified as a gap in the current - and in previous - National Hazardous Waste Management Plans).

---

<sup>1</sup> References to food authenticity include food standards, food composition, consumer interests and labelling compliance. Deficits to food authenticity include food fraud, a term used to encompass the deliberate and intentional substitution, addition, tampering, or misrepresentation of food, food ingredients, or food packaging; or false or misleading statements made about a product, for economic gain. **Source:** DAFM

The EPA welcomes the proposed work and analysis of an 'ideal state' that will inform the framework of economic, institutional and regulatory targets necessary to deliver the future vision for the Irish food sector in the medium and long term.

The delivery of the ideal state will require that the above challenges be addressed through better regulation as well as implementation of the identified reform programme. The EPA also welcomes the commitment to setting of targets and key performance indicators for the future development of the Irish food sector.

This Programme is one of a number of Plans in the Agriculture Sector, including the CAP Strategic Plan, Ag Climatise, the Nitrates Action Plan and Food Vision 2030. It is essential that there is consistency and alignment between this Programme and the environmental objectives in other national and international plans/programmes and government policy.

If you have any queries or need further information in relation to this submission, please contact Dr Jonathan Derham, Programme Manager, Office of Evidence and Assessment ([j.derham@epa.ie](mailto:j.derham@epa.ie)).

Yours sincerely



---

Laura Burke  
*Director General*