



Submission to the National Bioeconomy Action Plan

27th January 2023

Introduction

The Irish Farmers Association is Ireland's largest farming organisation with approximately 71,000 members in 940 branches nationwide. We welcome the opportunity to make a submission on the National Bioeconomy Action Plan.

Farming and the agri-food sector is Ireland's largest indigenous productive sector, exporting food and drink worth over €16 billion in 2022 and providing direct employment to over 170,000 people with many more employed indirectly. It has been a key driver of economic activity across the rural economy employing over 14% of the workforce in the Border region and over 12% in the South East.

Farmers produce high quality safe food, renewable energy and other public goods, ensuring high environmental protection, landscape management and animal health and welfare standards. There is now recognition for the multiple roles of farmers, as food, fuel and energy producers, in addition to meeting environmental requirements and other public goods.

Sustainable management in agriculture, forestry and aquaculture is a basic prerequisite for producing the raw materials for the bioeconomy. The transition to a bio-based economy can only be successful if the primary food sector is supported to increase production and efficiency against the backdrop of growing environmental challenges.

Low farm income in many sectors continues to provide a challenge to the sustainability of farming enterprises. A sustainable and profitable farming sector is required to underpin the investment and innovation required to successfully deliver a strategy for the bio-economy.

IFA welcomes the opportunity to input into the development of a National Bioeconomy Action Plan. As a first step, we suggest that a number of guiding principles should be agreed to underpin the development of the bioeconomy in Ireland. IFA proposes consideration of the following:

- Income generating potential from natural resources must be maximised.
- The development of the bioeconomy must be complementary to, and not in competition with, high quality food production.
- Clear objectives prioritising the bioeconomy strategy's contribution to jobs and economic activity in rural areas must be set out.
- The available biomass streams must be used with higher value-added potential and given preference within the bioeconomy framework.
- Resource efficiency recycling should be optimised, where possible.

In addition, IFA has outlined a number of proposals on specific measures that should be taken in the delivery of a successful bioeconomy strategy. These are set out below.

1. Establishment of measurable targets

The National Bioeconomy Action Plan should set out clear and measurable targets (in the short and long term) related to income generation, employment and regional distribution of bio-based businesses. Clearly defined objectives and guiding principles will be essential to enable those working in the bioeconomy sectors to achieve goals and allow progress to be assessed.

These guiding principles should include:

- (i) Income generating potential from natural resources must be maximised.
- (ii) The development of the bioeconomy must be complementary to, and not in competition with, high quality food production (as per guiding principle set out in National Policy Statement

- on the Bioeconomy).
- (iii) Clear objectives prioritising the bioeconomy strategy's contribution to jobs and economic activity in rural areas must be set out.
 - (iv) The available biomass streams must be used with higher value-added potential and given preference within the bioeconomy framework.
 - (v) Resource efficiency recycling should be optimised, where possible.

2. Public awareness campaign for farmers

A targeted information campaign to promote greater awareness and understanding of the potential of the bioeconomy should be developed for farmers. The goal should be that farmers are better informed about bioenergy and biobased business, its benefits, challenges and the opportunities that it presents.

Given the complexity of the bioeconomy such a campaign is key to developing a knowledge-based dialogue between farmers and consumers to strengthen understanding of the potential of biobased products in Ireland. The campaign should also be used to provide an opportunity to establish new networks and connections, both regionally and nationally, between organisations, industries and the supply chain to assist in the development of the bioeconomy.

IFA would propose holding a national conference targeted at farmers to discuss the potential of the bioeconomy, the opportunities and the supports that are available to interested stakeholders. It would also provide an opportunity to showcase existing agri-businesses that are forging ahead in the bioeconomy in Ireland.

3. Demonstration projects

Although knowledge and technical potential of the bioeconomy has increased in recent years, significant gaps exist. Valorisation and demonstration projects should be supported to make the transition from research to production possible. These demonstration projects or models of best practice will create confidence in the market and encourage further investment. An example of such a project could be the establishment of a smaller-scale bio-refinery demonstration facility to produce citric acid, bioethanol, or other chemicals from crops such as barley and wheat. This would underpin greater confidence in the Irish tillage sector which is targeted for growth under the Irish Climate Action Plan.

On farm demonstration projects into crops and new farming systems to optimise yield of biomass must be supported. The funding programme must support the transition into practice by funding activities in plant production, agricultural technology and logistical networks.

The demonstration projects should also support on farm or community level development of business model innovations that link production cycles and by products from agriculture, forestry and aquaculture sectors to the most appropriate bioenergy and biobased products markets. This may require the establishment of collaboration networks between producers and relevant stakeholders.

4. Sustainable biomass production

Sustainable management of agriculture, forests and aquaculture is a basic prerequisite for providing most of the raw materials for the bioeconomy. The IFA led resource efficiency initiative, Smart Farming, focuses on improving farm returns while enhancing the rural environment. By developing resource management and operating resources efficiently, agricultural production can be increased whilst also benefiting the environment.

The policy must address the growing demand for biomass and the projected shortfall in biomass resources, by introducing new of measures or amending existing measures to increase biomass production, these include:

- (i) The re-introduction of an improved Bioenergy Scheme (BES) with additional energy crops supported under the scheme.
- (ii) Remove restrictions on planting productive marginal land to address the falling afforestation programme. COFORD Land Availability Working Group identified 180,000 hectares of land technically suitable for forestry that is currently restricted from the forestry programme.
- (iii) The introduction of appropriate funding to support Producer Organisations to establish regional and national networks, creating the necessary economies of scale to optimise efficiency in the supply chain.

5. Biomass market development

The Bioeconomy Action Plan should set out clear targets and measures to stimulate market demand in the bioeconomy, if farmers are to invest in the necessary infrastructure to develop sustainable supply chains. The development of the bioenergy sector in Ireland has been thwarted by the lack of a Bioenergy Plan and adequate supports to stimulate market development. It is essential that the Government introduce appropriate supports through the following measures:

- (i) Develop a National Bioenergy Plan so farmers have confidence to invest.
- (ii) Introduce a Renewable Heat Obligation scheme (RHO) with attractive subsidies as soon as possible to support the wide scale deployment of biomass production. This will give greater certainty and security of revenue for farmer led projects.
- (iii) Provide capital grant funding to farmers and forest owners to establish biomass energy supply companies/organisations to develop, build and operate biomass-based energy systems in order to meet the biomethane climate targets, as set out in the Climate Action Plan 2023.
- (iv) Streamline current regulations to support the development of AD plants, particularly a small scale on-farm AD plant.

6. Biomass trade and logistics centres

The development of regional biomass trade and logistic centres (BTLC) that optimise the sustainable mobilisation of Ireland's biomass resources and improve the economic effectiveness of production, must be a key priority in the policy statement.

The establishment of robust biomass supply chains is one of the biggest challenges to provide the required network spread of centres where potential customers can be guaranteed a quality supply over the long-term. Farmers must be supported to optimise logistics and trading to enable different biomass fuels (firewood, chips, straw, energy crops etc.) to be collectively marketed at a guaranteed quality and price.

A funding programme must be introduced to create end user confidence that a sustainable long-term supply of biobased products is available; therefore, the programme must support the following:

- (i) The development and coordination of farmer producer organisations to facilitate collective supply of biomass.
- (ii) The purchase and construction of essential infrastructure such as specialised harvesting, processing and transport machinery, storage and drying units, fuel quality measurement equipment and weighbridge and other infrastructure.

7. Training and development programmes

Ireland needs to build up and expand the expertise necessary for the bioeconomy, a network of specialised personnel including farmers need to be educated. Existing training programmes need to be adapted and new programmes introduced to inform farmers about new innovations to increase production, alternative crops or technologies to increase efficiencies on farms. Funding support measures should be introduced to support motivated students and farmers to develop the necessary skills to take advantage of the new opportunities offered by the bioeconomy.

8. Blue Bioeconomy

The National Policy Statement on the Bioeconomy (2018), precursor to the development and implementation of a National Bioeconomy Action Plan, extends from farming and the agri-food businesses to marine-based industries and products, recognising the potential for materials and their associated 'waste' by-products to be converted into valuable products aimed at generating innovative products and services from these marine resources. Further, the EU Bioeconomy strategy mentions further integration of marine and land-based farming, which presents new approach for a sustainable blue economy.

The potential for waste and by-products should also be investigated with particular emphasis on opportunities for circular economy initiatives (reducing waste to minimum or zero). The added value of shellfish by-products and waste shell which can be re-used as biomaterial for water and wastewater treatment systems, among many other uses should also be further investigated.

9. Conclusion

Farmers are critical drivers to the delivery of the National Bioeconomy Plan. They need to be motivated and convinced in the value of the bioeconomy and the benefits of new innovative techniques. Farmers want to get involved in developing new solutions but they also need to see the financial benefits of changing practices on the farm.

We trust that these comments are useful. If you wish to discuss any aspect of this submission, please contact [REDACTED]