

IRISH ORGANIC ASSOCIATION

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Input to Draft National Strategy for Horticulture 2023-2027

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Introduction

The Irish Organic Association welcomes the opportunity to respond to the public consultation on the draft National Strategy for Horticulture for the period 2023-2027. Such a strategy can help to direct efforts to increase the production and consumption of seasonal Irish organic horticulture produce on the domestic market, and to take advantage of international trade where appropriate. The sustainable growth and development of Irish organic horticulture must be part of futureproofing Ireland's food and nutrition security, whilst playing an active role in tackling our biodiversity and climate crisis.

Organic Horticulture in Ireland: Organic growers are a dynamic and innovative sub-sector of Ireland's organic food and farming sector. Sales of organic vegetables and fruit continue to increase year-on-year in Ireland, with growing awareness of the attributes of organic production. While Irish-grown organic horticulture production has expanded in recent years¹, the current supply is not able to meet demand from Irish consumers, with a significant amount of produce imported and consequently huge scope for import substitution with the right foresight and resources. The latest DAFM figures show that there were 360 growers in 2021, managing 568 ha of organic fruit and vegetables. Growers are engaged in several different routes to market depending on their operations from direct sales to consumers, to retailers and food service. Mushroom production, seeds and transplants, and amenities such as nursey plants and ornamental horticulture businesses are also engaged in organic production.

Irish Organic Horticulture Challenges and Opportunities: Scale and consistency of supply remain the main factors constraining the supply of home-grown Irish organic produce. Other challenges to growing and developing the Irish organic horticulture sector sustainably and improving the availability of Irish-grown organic fruit and vegetables include securing access to suitable land, attractive career, and employment prospects, minimising costs, and responding to seasonality and weather pressures, alongside maintaining continuity of supply throughout the year. The experience of the Maximising Organic Production Systems Project², led by the Irish Organic Association, demonstrated that by working cooperatively growers can improve the consistency of supply and individual farm profitability, through optimised crop planning, improvements in agronomy, and collaborative production and trade between growers. Total sales turnover of organic horticulture generated by the participating growers increased by +112% from €3.8 to €8.1 million between 2017 and 2020.

Below we outline our observations on the draft strategy highlighting the need for organic horticulture to be more clearly considered and integrated across the different actions of the Strategy in line with the ambitions of the EU Organic Action Plan³ and building on Ireland's current National Organic Strategy 2019-2025.

¹ For example, between 2017 and 2021 there was a 37% increase in the organic farmland area under fruit and vegetables. Farms can vary in scale from under 1 ha to over 100 ha (under arable and fertility)

² [Maximising Organic Production Systems – MOPS](#) was a European Innovation Partnership supported through Ireland's Rural Development Programme 2014-2022. Between 2018 and 2021 it worked with 11 organic growers around the country to devise comprehensive cropping plans to optimise production and support the continuity of supply in line with growing market demands.

³ The [EU Organic Action Plan](#) aims to boost consumption, stimulate production and processing and contribute to the EU's wider sustainability objectives. Several actions/recommendations are directly relevant to Ireland's own organic 2027 and 2030 targets.

Producer collaboration in the marketplace (Action 1.1)

- Different approaches to producer collaboration both formal and informal – including appropriate guidance - are needed as organic growers rely on a diverse range of routes to market.
- As well as Producer Organisations and Early-stage Support for Producer Organisations, other measures such as Knowledge Transfer Groups and other pilot projects⁴ may be more relevant to initiate formal and/or informal exchange and open peer-to-peer learning amongst growers.
- Knowledge Transfer Groups, for example, could take a multi-disciplinary approach that addresses both land use and routes to market in a more integrated way from crop planning and optimising production to ensuring continuity of supply and spreading the risk.⁵
- Exchange between organised groups of Irish and/or other EU organic growers⁶ has the potential to explore different business models for effective supply chain collaboration targeting consumer demand for local organic produce. Such exchanges could consider:
 - approaches to fulfilling quality requirements, reducing waste⁷, and supplying at consistent volumes that cover costs and support business viability including future investments;
 - Innovative and sustainable ways to extend the growing season (e.g., using non-heated greenhouses);
 - overcoming the wide geographical spread of growers and limits on storage capacity and logistical infrastructure; and
 - access to land for existing growers/new entrants (often linked to generational renewal).

Supporting smaller organic growers (Action 1.2)

- Direct selling⁸ is an important route to market for many Irish organic growers where a healthy profit can be made through direct sales of significant volumes of local produce in-season.
- It is a preferred route for many growers as they can make more profit selling directly with a flexible route to market and the ability to pivot more readily in response to market changes.
- Small growers often engage in a combination of sales channels, including direct selling and retail, to diversify routes to market and spread their risks.
- There is strong interest amongst small growers to collaborate when the right structures are in place. This allows growers to focus on certain crops while still marketing a wide range of produce.
- Producer Organisations in their current form, however, are often not very appropriate or attractive for small organic growers owing to the high administrative and operating costs associated with their establishment and management or if only engaged in direct sales.
- Notwithstanding the new support for Early-stage support for Producer Organisations, more simplified support for small grower collaboration including operational programmes (via State Aids) may be appropriate for groups of smaller growers as well as other measures such as:
 - Producer-consumer groups, and local food Coops potentially supported under LEADER Local Development Strategies and through Local Development Companies, including initiatives organised across counties and/or on a regional basis
 - Measures such as Knowledge Transfer Groups are equally important for small growers to initiate the exchange and build capacities (see above)

⁴ For example, the development of regional hubs to allow growers to collaborate at scale in terms of the storage and distribution of fresh organic produce and other organic materials. This could address the smaller scale and dispersed location of organic growers nationwide.

⁵ Knowledge Transfer Groups for horticulture growers would benefit from facilitators who are trained and/or are experienced agronomists

⁶ Not limited to recognised Producer Organisations

⁷ For example, resulting from not meeting market requirements e.g., weight and length

⁸ Ranging from direct sales to consumers via box schemes, community-supported agriculture, farmers' markets, farm shops, and trade customers in hospitality as well as between growers.

Written Charter between Gowers and Retailers/Consolidators (Action 2.1)

- Welcome the development of a written charter between all relevant growers and retailers as a first step towards a more partnership based-approach. Similar initiatives with the food service can also help to increase consumer access to local organic produce (see procurement below).
- With public policy seeking to expand organic horticulture, and industry feedback showing strong interest to increase sales of Irish organic horticulture going forward it is important that the specificities and nuances of organic horticulture are reflected in the charter.
- Many organic growers already have good trading relationships with retailers, nevertheless there are several issues that may be relevant in the context of the charter for all actors, including:
 - ensuring prices fairly cover the costs of local organic production and moving away from short-term contracts (e.g., up to 12 months) to longer-term contracts of 3-7 years;
 - appropriate mechanisms and visibility for groups of growers to collectively supply the volumes required of retailers;
 - review of onerous market specifications to limit food waste, whilst ensuring that minimum quality requirements are consistently met, alongside added flexibility;
 - buyer commitment where an organic grower invests in supply and a greater appreciation of the practicalities of local, seasonal organic horticulture to better forecast supply; and
 - Greater understanding of the challenges of extending the growing season for local and seasonal produce, including additional costs e.g., storage, packing and cultural practices
- If a Written Charter is to be established it is essential that the forthcoming Agri-Food Regulator plays a leading key role in monitoring its implementation, with appropriate enforcement powers, and resources to highlight best practice relationships across the supply chain.⁹

Consumer awareness and promotion of Irish organic horticulture (Action 2.2 and 2.3)

- The 2021 HI Survey,¹⁰ found that on average Irish people eat only 2.9 portions of fruit and vegetables daily, with just over one-third eating 5 portions or more per day, demonstrating that more needs to be done, along with reviewing the effectiveness of current interventions
- To further increase the attractiveness of Irish organic horticulture amongst consumers/citizens educational and promotional programmes should actively highlight the health benefits of organic consumption, including seasonal produce, and its contribution to the environment and society.¹¹

Consumer awareness and food education

- Education and health settings can play a significant role in promoting the consumption of fruits and vegetables produced in season and there is a need for Ireland to review its healthy eating guidance¹² and align them to the objectives/targets of the EU Farm to Fork Strategy.
- Such reviews are timely as increasing the consumption of organic fruit and vegetables will be considered by the European Commission in the review of the EU School Scheme framework under the EU Farm to Fork Strategy, and in accordance with Europe's Beating Cancer Plan.
- Notably, the EU Organic Action Plan has called for Member States to prioritise the distribution of organic products under the EU school scheme and particularly in Member States with low shares as well as increasing procurement of organic produce.

⁹ For example, there are several initiatives to source local organic produce in-season (established or being piloted) between organic growers and retailers that could be mainstreamed across the supply chains.

¹⁰ [Healthy Ireland Survey 2021 Summary Report](#), with previous surveys also observing similar trends

¹¹ There is growing evidence that organic food consumption can support the transition towards a sustainable diet ([Strassner et al., 2015](#); [Baudry et al., 2019](#)) as well as the benefits for the environment and society ([Sanders and Hess \(2019\)](#); [Reganold and Wachter, 2016](#))

¹² Regrettably, Irish national eating guidelines do not recommend the consumption of organic fruit and vegetables, with limited reference to locally produced crops or seasonality e.g., the [Healthy Ireland Nutrition Standards for School Meals \(2017\)](#); the [HSE Nutrition standards for food and beverage provision in healthcare settings \(2019\)](#)

- Furthermore, there should be a stronger emphasis on local organic produce and associated production methods in educational/promotion campaigns such as Food Dudes,¹³ with greater complementarity between food education and Ireland’s evolving school meals scheme.

Promotion and green procurement

- It is particularly important that the identity of organic horticulture is not blurred by the single-issue attributes of local produce more broadly, in contrast to the multiple benefits of organic production, which is backed by legally protected standards and a robust control system.¹⁴
- The merits of Irish organic horticulture should be an integral part of all promotional campaigns, complemented by specific marketing on the nutritional value and health benefits of individual crops grown in Ireland. Essentially, we need to value our domestically produced “super-foods”.
- The prioritisation of organic fruit and vegetables in Green Public Procurement Policy, on a gradual basis,¹⁵ working in partnership with growers and distributors is one way that the Irish Government can lead by example in delivering on wider sustainability objectives.¹⁶

Futureproofing career and employment prospects in organic horticulture (Actions 3 and 4)

- High labour costs and farm worker shortages are well-known issues in the horticulture sector. Organic crop production is generally labour-intensive, with long working hours. Consequently, reliance on volunteers/casual labour with limited/no growing experience is common.
- At the same time organic horticulture production can contribute to local rural employment and some organic farms are successful in retaining employees/workers with skills and experience.
- While increasing the availability of skilled seasonal workers can be a short-term solution for some enterprises, in the long term more sustainable solutions are needed to make job prospects for skilled horticulture growers and employees as well as improve work-life balance.
- Long-term apprenticeships/graduate programmes of 2-4 years,¹⁷ co-funded by government, could give seasonal workers and other aspiring growers an opportunity to develop a long-term career path including/following formal training, with public bodies (e.g., Teagasc) leading by example.
- Furthermore, Ireland could be a forerunner in calling for an EU-wide programme for long-term apprenticeships specifically targeting the horticulture sector in line with the Farm to Fork Strategy and the European Pillar of Social Rights.
- Opportunities should be explored to develop an installation/ business development grant scheme targeted specifically at young farmers and new entrants in the early stages of their organic market gardening career (i.e., where the young farmer/new farmer schemes are not appropriate).

¹³ A study conducted by UCD of the Food Dudes campaign for the period 2010-2016 found that while a high percentage of children continued to consume fruit following the intervention, vegetable consumption was significantly lower ([UCD, 2016](#)). Feedback from parents has highlighted that the produce used tends to be raw, pre-prepared and pre-packed in individual plastic bags, with no emphasis on appearance, freshness, food provenance, or food production methods.

¹⁴ The most recent assessment of the EU organic regulations highlights how specific production rules, based on a farm system approach, are orientated towards respecting nature’s systems and cycles, contributing to biodiversity and making responsible use of natural resources - energy, water, soil, air and climate ([Sanders, 2013](#)).

¹⁵As part of a stepwise approach tenders could be based on specific organic horticulture products or a percentage of purchase calculated, either in weight/volume or value and within a certain period (e.g., weekly, monthly, quarterly, etc.)

¹⁶ The experience of Denmark shows that there are many positive environmental and social benefits of converting public kitchens to organic, including healthier, more climate-friendly menus with an emphasis on seasonal and locally sourced agricultural products, including vegetables. Through appropriate training on practical food preparation and application of organic food production systems food workers well-being also improved ([Sørensen et al., 2015](#))

¹⁷ In line with the changes to the Industrial Training Act (1967) permitting the delivery of apprenticeships in primary production. There are also potential opportunities under Ireland’s Employment, Inclusion, Skills and Training Programme 2021-2027 supported under the European Social Fund+

Addressing Education, AKIS, Research and Innovation Needs (Actions 4, 5, 7 and 8)

Education

- Further investments in education, complemented by an Agricultural Knowledge and Innovation System appropriate to the needs of organic growers, remains essential to untap the potential to develop an innovative and dynamic organic horticulture sector in Ireland.
- Ireland has some courses at certificate level (NFQ Levels 5 and 6) focusing on organic horticulture production,¹⁸ however, opportunities are needed for growers to progress to Bachelors or Masters level (NFQ Levels 7-9), including appropriate placements and graduate programmes (see above).

Advisory services and continuous professional development – CPD

- Agronomists dedicated to organic horticulture production, with expertise and knowledge in diversified rotations and specific high-value crops are urgently needed, reflecting the high level of technical and problem-solving know-how necessary in organic production methods.
- This can range from crop planning and improving management practices (e.g., soil and plant sampling and interpretation), and enhancing profitability by developing or optimising new and existing different routes.
- Investments in specialised CPD for organic horticulture advisors is essential to enable the sector to grow sustainably over the coming years. There may be opportunities to incentivise established growers to engage in advisory work and/or mentor early-career agronomists.

Research and Innovation

- A mapping exercise of existing research on organic horticulture production in temperate climates (incl. Ireland) is needed as a basis for establishing current gaps and research needs.
- Research priorities and accompanying proposals should be informed and co-implemented in partnership with representative organic sector organisations to ensure research outcomes are relevant to growers' needs and, in a format appropriate for wider dissemination and outreach.
- Organic growers are innovative by nature from enhancing agronomic practices to engaging new product lines.¹⁹ Organic horticulture should therefore be at the heart of pathways towards more resilient business models within a circular bioeconomy (in line with organic principles).

Better data collection to support sustainable growth and development (Actions 6.1, 6.2 and 6.3)

- Regular data collection is critical to better understand the needs/expectations of Irish organic consumers to inform business decisions and diversification options. This ranges from potential opportunities for adding value to existing locally grown crops to prospects for import substitution.
- Sales data of Irish and other organic horticulture produce by crop should be collected from retailers by the CSO, and presented in an aggregated and anonymised format, to help inform business forecasting and support the development of organic short supply chains going forward.
- Clear and accurate baseline data on organic horticulture production published annually in a consistent and comparable format is also needed to monitor current trends by crop and identify where there are opportunities for import substitution (cross-checked against sales data)
- Although valuable to evidence the sustainability credentials of Irish horticulture it is important the methodologies are appropriate for organic and low input systems. The experience of life cycle assessment methodologies is that they do not fully capture key externalities.²⁰

¹⁸ Courses offered by the Organic College - An tIonad Glas, Teagasc, NOTS as well as the Organic Farming Internship Programme in Horticulture for instance.

¹⁹ Examples include producing sprouts/microgreens, organic transplants production, recycling of organic materials/composting

²⁰ For instance the effects of farming systems on biodiversity and soil health are not always part of such life cycle assessments (LCA) due to a lack of appropriate research methods ([Meier et al., 2015](#))