

Promoting an Inclusive Food System for the Future

As the Keynote speaker for the Third National Food Systems Dialogue convened by the DAFM on 4 May 2021, I wish to submit the text of my presentation for consideration under the public consultation of the Draft Agri-Food Strategy to 2030. I do so by first highlighting the following text from the Strategy:

(The Strategy) “been drawn up using a ‘food systems approach’ which acknowledges the link between policies for food, climate and the environment, and health, and focuses on the role each part of the food chain has in delivering the 2030 vision. Sustainability in its three forms – economic, environmental and social – are at the heart of the Strategy.”

As someone who has authored or co-edited six books on food and/or sustainability, and with another on food systems in the pipeline, I draw upon my expertise in highlighting areas of weakness at the heart of the Strategy. Despite claims that it “signals a significant change in direction and policy” from earlier agri-food strategies, it remains – in my view – heavily preoccupied with production targets and insufficiently attentive to health or sustainability. A genuine ‘food systems approach’ requires the broadest perspective that enables human, animal and planetary wellbeing to be integrated such as that proposed by the One Health notion. Moreover, recognising the indivisibility of life requires recourse to interdisciplinary thinking that necessitates a much more sophisticated grasp of sustainability than that proposed by the Strategy. It is no longer sufficient to speak of the economic, environmental and social dimensions alone but must be underpinned by consideration of shifting ethical frames of reference, social justice and a rights-based approach. Such considerations lie at the heart of thinking about ‘an inclusive food system for the future’. As I note below, it is to the Department’s credit that this topic was chosen as the theme for the third of the Dialogues; but its selection implies responsibility to accept the need for a change in thinking and in policy. This is the real challenge for building a genuinely sustainable, healthy and inclusive food system going forward.

Text of the Keynote: Delivered online 4th May 2021.

I would like to acknowledge the Department’s willingness to address the matter of inclusion as part of this Dialogues process. This is a topic that challenges many of the prevailing arrangements around the governance of food systems. Unfortunately, it is a matter that is frequently overlooked when compared to the imperative of increasing economic growth. So, we begin by giving some context as to why the matter of inclusion is so vital in thinking about a ‘food system for the future’ – which surely has also to be a more sustainable and healthier one.

In light of the draft agri-strategy for 2030 we might first reflect on the state of food security and nutrition at home. Even before the current pandemic struck around 1 in 8 households were regarded as suffering from food poverty. The circumstances of economic austerity and increasingly precarious employment faced by many lower income households since the financial crash of 2010 has resulted in increasing numbers presenting at food banks. This is not a distinctly Irish problem: in 2018, around 800,000 tonnes of food products were distributed to nearly 10 million people via charitable organisations across Europe. Of course, the pandemic has significantly exacerbated this problem as families try to get by on PUP payments – if they qualify. It's no wonder we have seen such a rise in requests for emergency provision through existing charities or through food hampers organised by local authorities.

It might at first glance appear a 'win-win' to redirect surplus food from landfill to feeding hungry people. But it does not demonstrate a societal commitment to a human right to food. It does not deliver food security with dignity. Indeed, it has been described as the use of 'left over food for left behind people' and numerous social policy analysts have argued that charitable food distribution models have become part of the problem of food insecurity as opposed to part of the solution. Above all it demonstrates the structural nature of industrial food systems that are characterised by mass manufacturing of highly processed foods leading to huge surpluses – the disposal of which is solved by dumping on poorer populations.

We learnt from last week's Dialogue that we also have in Ireland one of the highest rates of overweight and obesity in Europe. This is not a consequence of irresponsibility on the part of consumers but the logical outcome of a food system delivering unhealthy diets particularly to those on low incomes. Around 70% of mortality is linked to Non-Communicable Diseases most of which are diet-related. In the EU NCDs are estimated to cost €700 billion annually, representing 70-80% of healthcare spending by Member States. We might note that an extraordinary number of senior health professionals in the NHS last year submitted a document to the UK government highlighting the pressure that the NHS was under as a consequence of diet-related chronic diseases. Their statement argued for serious policy measures to regulate junk food and to encourage more plant-based food consumption.

We know what constitutes a healthy diet although research has shown that only 1 percent of the Irish population eats in line with the food pyramid, and less than 40 percent of the population get their '5 a day'. This is because the food environment in which we live is one promoting energy-dense, micronutrient-poor foods and beverages. Products which are high in saturated fats, sugar, and salt are tasty, cheap and ubiquitous – and responsible for a public health crisis. Yet in spite of this knowledge, we continue to focus on pulling out drowning people from the river – some of whom become patients of Dr Donal O'Shea as we heard last week – without ever asking why people are falling in upstream. We must begin to

ask questions of the obesogenic food environment in our towns and cities that encourages people to eat badly – if cheaply – if we want to build a healthier food system for the future.

To speak of a food system is, of course, to broaden the perspective beyond agriculture and to recognise the inter-connected concerns of health, wellbeing, its diverse cultural meanings, the skills, knowledge and self-esteem that it promotes, and its role in strengthening community (a point made last week by Caitlín Uí Aodha and Brendan Dunford). Food, then, is a wellspring of so much more than economic exchange and it is many of these diverse attributes that provide the means for inclusion.

Before we look at some of the methods this might involve, I want to briefly turn my attention to the term ‘sustainability’ which features strongly in the 2030 strategy and is widely used by the industry to promote its green credentials. I have to confess that when I see the term applied so frequently across the sector I think of Harry Potter. Harry, as many of you know, had an invisibility cloak that allowed him to move through the corridors of Hogwarts at night without being spotted by Professor Snape. I think sustainability is often deployed in much the same way: as a cloak to conceal the hard evidence that industrial agriculture exerts a high environmental burden. So when an outdated notion of sustainability, made up of social, economic & environmental considerations, - and where in reality the economic trumps all with recourse to claims of ‘efficiency’ - it is time to ask if this term is still fit for purpose in the 21st century.

This conception of sustainability derives from the 1987 Brundtland Report, Our Common Future, a report that drew our attention to including future generations in any calculations. But just as Ireland has changed immeasurably since 1987, so has our understanding of what sustainability represents: it IS more than simply a trade off between these three broad and rather abstract labels. For those of us who have been working on issues of sustainability for some time – and here I acknowledge my colleagues at UCC with whom we have recently produced two books on the topic – we have come to appreciate the need for a deeper, more robust conceptualisation. Let me briefly outline 3 points that I believe must inform our understanding of sustainability.

First health – human, animal, planetary – is absolutely central. The complex & interconnected interaction of these 3 factors has been demonstrated above all by Covid-19: the emergence of the virus as a zoonotic disease. A Planetary Health perspective helps us to frame the limits in which we have to live – if we wish future generations – or even young people of today - to have prospects of a safe and secure existence.

The second dimension of a more robust conception of sustainability is the need for a holistic, transdisciplinary and systemic approach that recognises the partial, contingent and variable nature of our understanding and how we must build greater resilience and redundancy into our production and consumption practices. In short what I mean by this is:

foot to the floor productivism aiming to achieve ambitious export targets cannot be concealed by the cloak of sustainability.

Third, is the changing ethical frame of reference. Again, if we contrast the Ireland of 1987 with that of today we see an utterly different ethical landscape, eg. around women's reproductive rights as well as their 'place' inside the home – recommendations for constitutional reform that have arisen from the Citizens' Assembly. I would contend that this ethical framework is changing quickly around our relationship with the natural world and other forms of life; there is a sense that we no longer have 'God-given' rights to rule over the Earth but must begin to accept a relationship of co-existence with other species.

So, if we really want to be leaders in an inclusive, zero-carbon future we are not starting from the best place. But here is where we find ourselves seemingly locked into path dependent thinking on producing more high-carbon agri-commodities. This is not only environmentally problematic – I would argue that it is likely to become increasingly economically precarious. For notwithstanding efforts to prove the superior efficiency of grass-fed cattle the evidence points to the fact that we have a highly specialised and unbalanced agricultural system oriented more to the outside world than to the domestic market. Ireland imports around 80 percent of its feed, food and beverage needs amounting to around €12 billion last year. Not only is the trade surplus on agri-food smaller than we might think, this structure does not support a sustainable, secure or healthy food system.

Yet we persist with promoting agri-commodities that are increasingly the subject of intense scrutiny and criticism. In the first Dialogue session Laura Burke spoke of the serious reputational risk we face with continuing claims to being 'clean & green' when the evidence demonstrates otherwise. It is not a rhetorical extravagance to anticipate that beef might soon be regarded as a toxic product, even to be represented as the 'new tobacco'. This analogy may be more appropriate than we might like given what we know about Big Tobacco's efforts in concealing the evidence that smoking is deleterious to health. But which country has achieved international recognition for its success in tobacco control in the interests of public health? Ireland. And how did it do this? Through leadership and the willingness to challenge vested interests in favour of the greater public good.

The food system therefore needs public policy to regulate, restrict and incentivise just as health-centred policies have rolled out smoking cessation supports alongside taxation measures, bans and so on. A Food Policy – not an agri-export strategy - brings our attention back to the domestic level, and does so by joining up different elements of public policy that are too often disconnected: health, environment, planning, rural development, education. And of course, an effective national food policy would find innovative ways to ensure the inclusion of many voices beyond those of business such that citizens themselves can make themselves heard and thereby unleash the potential of participation, equality, accountability, transparency, empowerment & dignity. These elements enable us to embark upon the progressive realization of the right to food.

As we move forward into the post-Covid era there is much talk of building back better. Inevitably – in light of Covid but also Brexit – priority is given to agricultural productivism & the 2030 Strategy as a means to boost economic growth. But any notion of Building Back Better should involve a reimagining of our food system that is healthier, sustainable and inclusive.

Clearly this needs to begin by recognising that any change of direction in agriculture must involve farmers in a way that ensures a just transition. But a better food system needs also to embark upon a participatory dialogue with citizens. Many communities are waking up to the possibilities of being more engaged with their food, they want to assert a sense of agency beyond that of a ‘consumer’. There are a multitude of initiatives emerging not only in Ireland but around the world. Food is increasingly entangled with claims for greater social justice, cultural identity, and community empowerment. Calls for Food Sovereignty – the right of a people to determine their own food system – is now heard loudly and persistently in FAO, Rome - but is unfortunately conspicuously absent from the Food System Summit.

Which brings me, finally, to the Real Capital. We know that Cork is the food capital of Ireland for the history and quality of its produce. But it also has its share of deprivation and exclusion. These are difficult, intractable problems to address but in Cork we have tried to use food as a way of enabling people to empower themselves through skills acquisition, healthier eating, social connection. In 2013 we established the Cork Food Policy Council as a civil society organisation supporting inter-agency collaboration in helping to bring people together and to point a way forward towards a more sustainable local food system. We have had successes and setback as all such initiatives face. We have been disappointed that the City Council has been unable to provide more tangible financial support. But the exercise of working with a local authority has been instructive – for them as well as ourselves – and the outcomes have included greater public engagement in food, with community gardens and other greening initiatives springing up around the city.

Ultimately, it is at local level where we can make most difference by fostering a sense of food citizenship. In Cork we have barely scratched the surface but we see how rich and rewarding this work can be in helping to improve people’s lives. But while action is local, policy still needs to come from a national level providing the incentives that support local efforts but also guide population level impacts through incentives and restrictions.

Food banks are unfortunately likely to be a fact of life for a while yet, but we should be working to reduce the numbers of people that present themselves for emergency rations not celebrate the ever greater volumes of waste food that is being redistributed. This is part of the challenge in working for greater contributive justice and inclusion in our food system.



**Domestic Local Market development:
Regional Policy for Micro & Artisan Food producers.**

A new perspective to address challenges facing Artisan/Micro Food Business – leveraging the potential of EU Protected Designation of Origin (PDO) & Protected Geographical Indication (PGI) schemes in Ireland.

Regional food Strategy:

Food Wise 2025 does not provide strategy direction for regional or local food development. It defines the areas of responsibility for Local Enterprise Offices (LEOs) around “Creation of civic and festival markets similar to the English Market in Cork and Harvest Festival in Waterford” and the “Expansion of Dublin Food Chain initiative to other cities” to create a pipeline of companies growing beyond Artisan/Small Food Business with bespoke and group multi-level supports across strategic planning, marketing and marketing finance. The other programme areas in Food Wise concerning artisan and speciality food is the responsibility of Bord Bia/Teagasc/Enterprise Ireland who offer a number of programmes for established small food businesses such as Food Works targeting high growth potential companies.

The High-level Implementation Committee chaired by Minister for Agriculture, Food & Marine responsible for delivery of 2025 targets is made up of major stakeholders and state agencies but does not have any representation from small and micro food businesses who are responsible for new start-ups and early developing food companies. There is a lack of a clearly defined Regional food policy for small food businesses and local food infrastructure. LEOs along with County Councils develop their own Food strategy for their regions which are loosely aligned to Foodwise 2025. There is no national policy for the development of micro food infrastructure and consequently different business models are used locally and regionally. These vary from county to county from provision of test kitchen facilities for ad hoc product development to dedicated incubation units with specific fit-outs and add-on services.

Food Tourism

Food Tourism on the other hand is better integrated as part of local and regional food development strategy. Failte Ireland has developed a Regional Strategy for Tourism with local food playing a central part of the strategy. Working with Local County Councils the strategy focuses on developing a growing local foodie and eating scene, widening the offer for visitors, making it accessibility to local consumers as well as appealing to the prospective food tourism segments across USA, UK, France, and Germany. Apart from economic benefits food tourism also impacts on local quality of life and can be used to foster a more positive image of local regions as tourism destinations.

New Start-up's

To help lower entry barriers and develop a pipeline of new food entrepreneurs the Agri-Food strategy should guide local Authorities and LEOs to ensure their regional strategy is properly aligned to national strategy. One of the key objectives of Local Authorities and LEOs is the provision of food infrastructure to help small food business take the next step in starting or expanding their business with minimal financial risk and encourage small producers to upscale to a commercial kitchen without incurring large capital expenses. The regional business model should enhance existing stakeholder facilities operated by Local County Councils, LEOs, Enterprise Ireland, local community

development companies as well as third Level institutions and be complimentary to Green start and LEAN programmes.

To ensure better integration for artisan and small business development LEOs should be represented on the High-Level implementation committee which is chaired by Minister for Agriculture Food & Marine and made up of all the main stakeholders and state agencies involved in the food sector.

Regional Food Brands

Provenance is a key differentiator in successful regional food strategies and many European regions in France, Italy, Spain and Denmark highlight the number of specially food products designated as PDO/PGI as a measure of their credibility as a food destination, including Baden-Württemberg, Flanders and the Basque Country

Successful Regional Food strategies tend to have a number of similar characteristics which include a strong farming tradition producing quality agricultural produce, local pride in the quality of food an aspiration for international recognition by local groups, co-ops or associations supporting food-related festivals, farmers markets and other local food events. In addition, success is usually determined by the strength of regional/local government support and a clear identity and strategies that cover both tourism and food and the engagement of ground-level stakeholders: producers, retailers, and the hospitality sector.

Regional food brands centred around sustainable locally produced food and drink products creates a unique point of difference, authenticity and heritage which would underpin regional food destinations. Regional food brands provide a platform to promote these values and create greater marketing scale for small producers through group marketing and promotional activities under the Regional Food corporate brand umbrella in domestic and export markets.

Creation of a umbrella regional food brands structure in Ireland could strengthen the link between Producers, Stakeholder, and Consumers about the region and its food products and help create a sense of pride about its food producers and the important role they play in food tourism and the local economy. The benefits cascade down the supply chain to individual producers who normally lack resources or who would find it difficult to get access to high profile marketing and promotional events. Regional food brands also have the potential to gain momentum on the export market, giving food from the regions around Ireland a competitive edge over competing regions and countries.

New perspective needed to address challenges facing PDO/PGI schemes in Ireland:

There are over 3,000 products with Geographic Indication (GI) registered in Europe, however uptake of the schemes in Ireland has been low, despite major growth in the artisan and speciality food sector and support as part of Government's 2025 Food Wise Strategy. There are currently eight Irish products registered along with six applications awaiting approval with the Department of Agriculture Food & Marine (DAFM) who manage the scheme.

In Ireland DAFM is responsible for the administration of the schemes which is done in conjunction with the GI unit in EU commission. DAFM handle the day-to-day management of the schemes

including processing applications and interacting with producer groups to enable them get through the national consultation process and subsequently approved by the GI unit in Brussels. DAFM is also charged with marketing and promoting the schemes in Ireland which they do through their web site and holding occasional informational seminars.

While the uptake of GI designations is low in Ireland, this branding offers considerable potential to enhance sustainability and address market and supply chain changes and opportunities.

Sustainability

By their nature PDO/PGI schemes support the widely-held perception that traditional and locally produced food products are better for the environment and consumers by supporting local, are behaving in a more socially responsible manner. Quality and reputation for PDO/PGI products does not rest exclusively on factors linked to origin. Sustainability plays an important role in meeting consumer expectations which are linked to contribution to the local economy and environmental sustainability. Sustainability is becoming an increasingly important part of the registration process, in addition to the link of origin. As such GI food product branding provides an ideal platform to promote the value of sustainable food production amongst producers and communicate these product attributes to consumers (*responding to Goal 1, Draft Agri-Food Strategy 2030, April 2021*).

Geographical indications, which identify quality products rooted in specific areas, have proven to be an effective sustainability tool. Producers of traditional products rely on biodiversity and the protection of the environment in the area where they operate. Likewise, GIs rely on an important network of small and medium-sized companies that provide jobs both directly and indirectly, often in disadvantaged rural areas where there are rarely any alternatives.

GIs also help producers improve their position in the value chain as well as securing a better price for their products. EU Studies indicate significant price premium can be achieved for GI products compared to standard products in the category. The premium varies by product category but overall, the total value premium for Agri-food GI's is estimated around €8bn.

Brexit

Most small-scale food producers in Ireland have limited resources and are exposed to Brexit in a number of ways. Weaker Sterling reduces spending power of UK consumers who are, in turn, being encouraged to buy more local UK produce. The UK is the most important export destination for smaller food producers and some sectors like farmhouse cheese consolidate their 3rd county exports in the UK for onward shipment to the US market which adds a further disadvantage. PDO/PGI schemes creates opportunities and a point of difference for Irish niche food and drink products by providing a marketing platform to extend their reach into EU mainland markets which Ireland has not exploited to any significant extent to date. GIs represent a vehicle to support premiumisation in these markets which is directly linked to value creation at producer level, thus supporting equitable distribution of value-add (*responding to Goal 2, Draft Agri-Food Strategy 2030, April 2021*).

EU research has confirmed consumers are willing to pay a higher price for GI foods which are unique and differentiated from mainstream equivalents provided they demonstrate that origin is matched

with unique attributes. By supporting small and local producers, consumers feel they are behaving in a more socially responsible manner and engaging with local communities.

Covid-19

Local communities and regions can communicate the environmental benefits of PDO/PGI products which helps promote the benefits of traditional and local foods. These schemes strengthen producer, stakeholder and consumer loyalty about the local region and its products and helps create a sense of pride about its producers and the important role they play in the local economy and in tourism developments. Support mechanism to enhance the opportunity to achieve GI status aligns with a coherent policy approach to value creation with clearly labelled products supporting communication with citizens and consumers (*responding to Goal 3, Draft Agri-Food Strategy 2030, April 2021*).

Demand for local food and drink produce is sustained in the most part by local people and consumers need information to turn low awareness about purchasing local into sustained support for local food producers. Local food can be driven by positive reasons such as support for local farmers and traders, and desire to eat high-quality traditional products that may not be found elsewhere. There should be more focus on gathering market intelligence about consumers and local food purchasing behaviour to improve targeting and key messages to different audiences. Research could be undertaken in conjunction with regional stakeholders who have the expertise to carry out this type of work such as universities in conjunction with Bord Bia to examine consumer behaviour about local food in key regions examining associations with 'Local Food' products purchased regularly.

Challenges:

Food producers

While the benefits of designated schemes are significant, there are a number of challenges facing producers, including a realistic assessment of the time and effort required to undertake registration process which is labour intensive and can be extremely long drawn out because of historic shortage of resources in DAFM. This leads to producer fatigue with the system as many don't have the expertise, knowledge or time to provide the necessary information to successfully complete the application process.

Marketing

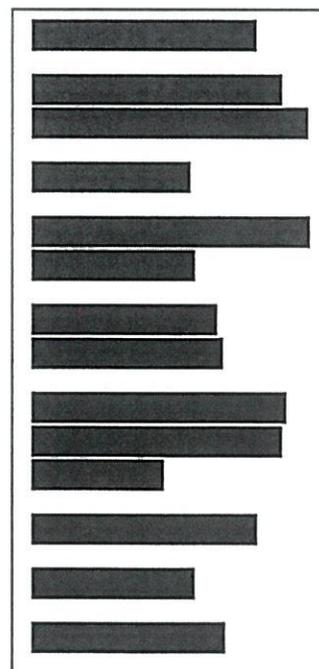
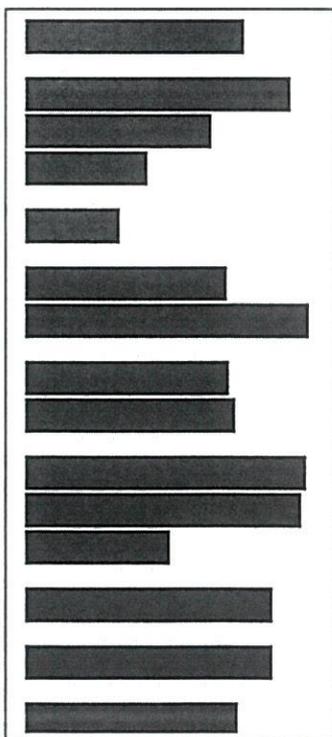
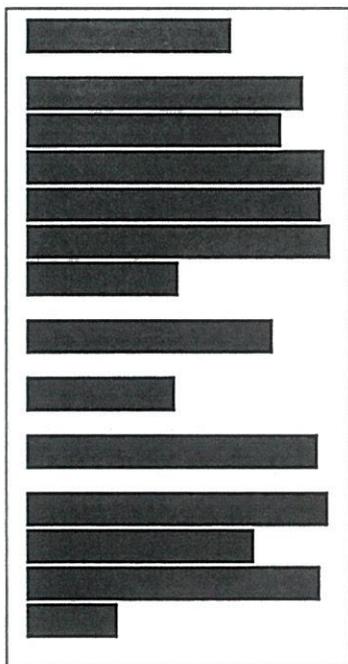
The main consumer challenge facing GI food products is communicating intangible benefits such as origin, authenticity, heritage and tradition, which are difficult concepts to communicate compared to functional benefits. Currently on-pack PDO/PGI logos and GI merchandising are used to communicate messages to consumers, however consumers don't always understand what the logos mean and this is a barrier to improving awareness of the benefits of GI schemes. In addition there is increasing propensity for on-pack food labels to carry more information from regulatory and certification bodies such as nutritional values, food safety requirements, production and processing methods such as Organic, Fair Trade, etc., all of which combine to create confusion with consumers.

Key Recommendations

Establish a National GI Framework to bring together key stakeholders to deliver an integrated approach to support food producers achieve GI designation over the next 5 years. Stakeholders would include DAFM, Bord Bia, Local Enterprise Offices and Universities to provide expertise and research support to producer groups to establish a Centre of Excellence for GI's in Ireland.

Centre of Excellence to provide: (i) pre and post GI awareness surveys, (ii) disseminate EU GI case studies, (iii) research teams, supported by third level food educational programmes, assigned to Producer Group, and (iv) publication of Irish case studies. In conjunction with LEOs provide specialised food mentor support, with facilitated workshops to manage food group dynamics and provide guidance to individual food producers and producer group members as they go through the application process. Introduce a new GI scholarship scheme including workplace producer placement as part of the Centre of Excellence work programme.

Enhance marketing and promotion of PDO/PGI effort to include Bord Bia or Local Enterprise Offices who have the required expertise in the area and develop a 3-5-year business plan with clearly defined and measurable targets, including producer research support and access to expertise in Universities via the Centre of Excellence. Targeting an awareness campaign focused on product categories and producer groups that offer the best opportunities for success.



FSAI View on Agri-Food Strategy 2030

The Food Safety Authority of Ireland (FSAI) welcomes the opportunity to comment on the Draft Agri Food Strategy 2030. Our comments will be within the context of our legal mandate as set out in the FSAI Act 1998 as well as with respect to any unintended negative impacts on consumer's health and interests associated with food that could be considered in the implementation of the Strategy.

FSAI believe this is a comprehensive Strategy that will serve the Agri-Food sector to 2030 as it aims to becoming a world leader in Sustainable Food Systems (SFS) over the next decade. FSAI welcomes this Strategy for the following reasons:

- The broad-based stakeholder committee that developed the strategy sits well with the Strategy's systems approach in terms of social, environmental and economic sustainability.
- The centrality of food safety and authenticity to its success is well recognised with one of the 4 Missions dedicated to Safe and Trustworthy food which is the Vision of the FSAI.
- The acknowledgement of the need for policy coherence between key areas such as food /climate /environment and the potential synergies/trade-offs and compromises involved. The proposed establishment of a High-Level Implementation Group is welcome in this regard. So too is the proposed co-chaired high level group between the Department of Health and the Department of Agriculture, Food and the Marine to improve policy coherence for food, nutrition and health.
- Its alignment with the objectives contained in the UN Sustainability Summit goals, the EU Green Deal and the EU Farm-to-Fork Strategy. It is important that Ireland is in a strong position to contribute to the delivery of these objectives.
- Recognition of the importance of implementing the recommendations arising from the delivery of the DAFM Food Safety and Authenticity Strategy (2018)
- The strong monitoring and implementation framework that it sets out and especially the upcoming development of a detailed implementation plan.

FSAI have specific suggestions/recommendations that it believes will help to strengthen and deliver the primary objectives of the strategy particularly in respect of food safety and authenticity.

- The Strategy, set within the national and international policy environment, strongly embraces the principle of interconnectedness which also extends to alignment/coherence with complementary strategies/policies i.e. biodiversity, climate change, waste etc... And whilst not within the strict scope of this Strategy, it will be important that Ireland speaks with one voice or at least represents the voice of many stakeholders at European level. This will maximise the opportunity for Ireland to comprehensively and coherently engage with the ongoing and evolving dialogue in the European Institutions as well as at the UN Food Systems Summit. The proposed High Level Implementation Committee could act in a co-ordinating role for the purposes of engaging with the aforementioned dialogues and event as well as the implementation of the strategy. Given the importance of safe, nutritious and trusted food in a sustainable food system, the FSAI believes it is an important stakeholder in the implementation of the Strategy and would welcome the opportunity to participate in the High level Implementation Committee for the Strategy as well as the proposed co-chaired Committee with the Department of Health.
- The Strategy is consistent in the need for the provision of evidence to provide assurances to consumers and to markets. The FSAI would recommend a review of all relevant datasets that are currently available, both internally within Government and Agencies, as well as data held externally by Industry or in open data sets to ensure the evidence can be provided. Data will be critical in substantiating a safe, nutritious and sustainable food system if Ireland is to retain the trust of consumers in Ireland and abroad.
- The EU Farm to Fork Strategy aims to put in place a legislative framework for Sustainable Food Systems including labelling. The Strategy signals the collaborative efforts between Teagasc and Bord Bia in respect of sustainability. Consideration should be given as to the role both Agencies and others, including FSAI, can make to influencing this legislative framework. FSAI has already facilitated a Bord Bia engagement with the Heads of Food Safety Agencies in Europe who are reflecting on this objective within the Farm to Fork.
- There is a proposal to establish an Environmental Sub-Group and one task of this group is to monitor the strategy's impact on the environment. FSAI would like to propose the establishment of an equivalent group to monitor the Strategy's impact on food safety and authenticity. The principal aim of such a group is early identification of unintended negative impacts arising from activities in other areas. Given the centrality of food safety/authenticity to the success of the strategy "trade-offs" there is no room for complacency. Food is not food if it is not safe. Safe food is a fundamental of any food system.

- Action 10, Goal1, Mission 1 (page 54) and Action 5, Goal2 of Mission 1 refer to a proposed risk assessment to assess the impact of both climate change and EU proposals for pesticide reduction on Irish Food Production and Safety. FSAI have relevant expertise here and would like to participate in this and broaden its scope.
- The strategy refers to the need to develop a composite indicator/Index of sustainable food systems. This should be prioritised as it would add to scientific credibility and provide a metric on which to benchmark the success of the implementation of the strategy over time. A food sustainability index has been created by the Barilla Centre which could meet this need or be further developed if required <https://foodsustainability.eiu.com/>
- Goal 3 of Mission 1 deals with water quality but makes no reference to its microbiological quality in relation to pollution. This needs to be addressed by way of an additional action point – to protect waters from microbiological pollution from agricultural sources.

In the overview of Mission 3 (page 101) it is stated “Food security and nutrition is a key component of Sustainable Food Systems”. This should be reworded to “Food security, **food safety** and nutrition **are** key components of Sustainable Food Systems”.

In Mission 3 (page 111) it is not clear how Goal 4 “develop market opportunities at home and abroad” is linked to the other aspects of this Mission “safe”, “nutritious” and “trusted” food. This Goal should be moved to another more appropriate mission (propose Mission 4).

- An objective of Mission 3 is “The enhancement of consumer trust through providing evidence of safe and ethical food production”. FSAI plays an important role here already and are well positioned to deliver on this – we already coordinate Ireland’s MANCP (Multi-Annual National Control Plan) returns to the EU Commission and a more consumer-oriented version using infographics etc could be developed.
- FSAI look forward to viewing the detailed Implementation Plan to underpin the success of the Strategy.
- Action 4, Goal one, Mission 3 refers to industry self-regulation for food product reformulation. The need for legislative/regulatory control should also be explored.



June 14, 2021

ICSF Submission to the Consultation on the Draft Agri-Food Strategy to 2030

Attention: Minister McConalogue, TD

Dear Minister McConalogue,

We have studied the "Draft Agri-Food Strategy to 2030" and laud its ambitions in developing a climate-smart, environmentally sustainable Agri-Food sector which also enhances air and water quality, fosters biodiversity, while providing highest-quality, safe, healthy and nutritious food in Ireland and abroad.

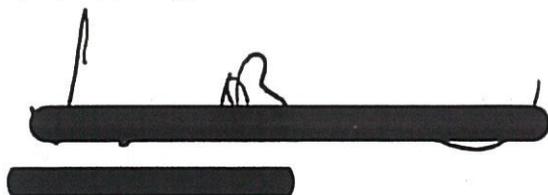
By way of introduction, the Irish Climate Science Forum (ICSF, www.ICSF.ie) is the only independent professional group in Ireland which objectively studies climate science and its policy implications. We recently made the enclosed submission on Minister Ryan's consultation on the proposed Climate Action Plan 2021, to which we wish to add two key points very relevant to this particular consultation.

1. It is absurd that national agricultural policy is being based on an outdated reference metric for the Global Warming Potential (GWP) of Methane (CH₄) compared to Carbon Dioxide (CO₂). The latest leading-edge measurement of actual forcings of the various Green House Gases (GHGs) through high-definition radiative calculations by Professors William Van Wijngaarden and William Happer, ("*Methane and Climate*", <http://co2coalition.org/publications/methane-and-climate/>) confirms that contribution of CH₄ to GWP is minimal and therefore that CH₄ is almost irrelevant as a GHG. These conclusions were clearly demonstrated in recent ICSF lectures, see <https://www.icsf.ie/lecture-series>. Other research collaboration between the Universities of Oxford, Reading (both UK), Wellington (NZ) and CICERO (Norway) has established parallel evidence that the currently-used GWP of CH₄ is very significantly over-rated.
2. Conversely, it is not fully appreciated that increasing CO₂ level is actually beneficial to greening of the planet through enhanced photosynthesis, and therefore will be beneficial to feeding the growing global population. This was first verified by satellite observations which demonstrated a very significant greening of the planet between 1982 and 2015, see "*The Greening Earth*", Prof Ranga B Myneni, Dept of Earth & Environment, Boston University, which was further verified in recent studies. Multiple observations have shown that the increased CO₂ level also reduces water requirements of agriculture; many references are available on www.co2science.org.

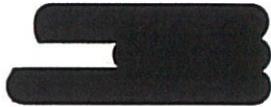
We in ICSF wish to see a sustainable future for Ireland and its people, but one based on the latest objective climate science, *which is actually supportive of further developing the Irish agri-sector*, rather than absurdly attempting to curtail it, despite the fact that world hunger is now sadly increasing.

We hope you will encompass these two absolutely key points in your very important "*Agri-Food Strategy to 2030*". We would be very pleased to provide any further information you might require by phone or email, or indeed to meet up in person should evolving COVID-19 rules allow.

Yours sincerely,





May 14, 2021

Consultation on the Climate Action Plan 2021 – ICSF Submission

Dear Minister Ryan,

An Introduction to ICSF

The Irish Climate Science Forum (ICSF, www.ICSF.ie) was founded in 2016 and its members include Irish scientists, engineers and other professions. We are committed to identifying and disseminating the latest climate science to all with an open and enquiring mind, driven by the imperative of objectivity without vested interests. We seek a sustainable future for Ireland and its people, consistent with safeguarding our economy. We aim to better inform national energy and climate-related policymaking in the best long-term national interest. We are self-funded, and do not accept corporate or sector funding. ICSF is now linked to the international CLINTEL think-tank on climate realism, see www.CLINTEL.org.

Our Submission on the Climate Action Plan 2021

We are very pleased to note that this consultation highlights that *"all voices will be heard in a fair and equal manner"*. That is welcomed, in that the political debate ever since the Citizens' Assembly in 2017 right through the various Oireachtas Committees has heard only the "doomsday" side of climate science; it is now time, we suggest, for balanced dialogue.

We therefore value this opportunity to be heard.

We make our submission by posing three fundamental questions:

- Q1. On what scientific basis was a climate emergency declared?
- Q2. Have the real implications of the proposed 2030 mitigation target been considered?
- Q3. Can Ireland actually afford the proposed 2030 mitigation ambition?

As you will see below, we believe that none of the questions have been sufficiently addressed. Therefore we believe that the electorate – and particularly our youth - should be adequately informed before adopting any climate action plan.

Q1. On what scientific basis was a climate emergency declared?

It is perhaps best to start with a few reality checks on climate science.

Forty years of climate research, costing billions of dollars, has failed to reduce the uncertainty in climate sensitivity estimates (that is the global temperature increase expected for a doubling of CO₂ in the atmosphere). In the real world, global satellite and surface air temperature measurements over the last 40 years reveal an average actual rate of temperature increase of ~0.15°C per decade, which if continued, points to a further temperature rise of only ~1.2°C by 2100.

These observations also demonstrate that the artificially-tuned IPCC models are on average 2 to 3 times over-sensitive to CO₂ increases (see, for example, videos of our recent lectures on <https://www.icsf.ie/lecture-series>). In particular, it is now also abundantly clear that the temperature rises of ~4-5°C by 2100 derived from the extreme RCP8.5 scenario in IPCC AR5 (or the corresponding similar versions in the draft AR6) have no basis in reality.



Based on a 100-year record of representative tide gauges globally, empirical evidence shows global mean sea level (GMSL) to be rising linearly at 2.1mm/year over the last 100 years, the earlier parts of which period clearly had minimal GHG influence. Satellite measurements show a steady rate of increase of 3.2mm/year over the last 30 years. Neither demonstrates significant acceleration within the natural variability, and also confirms no significant adverse trends in the cryosphere. Even the higher satellite rate would imply an empirically-based GMSL rise of only 25cm rise by 2100, which is far less than the oft-quoted figures of over 1m of the extremely-unlikely IPCC RCP8.5 and SROCC scenarios.

The media keep driving the misperception that "extreme weather events" indicate dangerous anthropogenic climate change. However, rigorous analysis of the decadal and even centennial global trends in precipitation, floods, droughts, heatwaves, snow cover, hurricanes, tornadoes, wildfires, sea level, its "acidity" and coral bleaching generally indicate that these trends demonstrate natural variability, are not unprecedented, nor are worsening.

The recent GWPF Report "*Extreme Weather in 2020*" by Ralph Alexander on recent weather trends (ref <https://www.thegwpf.org/content/uploads/2021/04/Extreme-Weather-2020.pdf>), provides much detail, as also does our "*Overview of the Latest Climate science for Policymakers*" (ref www.ICSF.ie). In a broader perspective, HH Lamb's classic book "*Climate, History and the Modern World*" demonstrates how relatively benign the climate is in the later Holocene Epoch. In particular, current and historical data on the Irish climate indicates that, if anything, it is becoming more benign. The IPCC SREX Report of 2012 and its AR5 Report of 2014 did not find evidence of links between "extreme" weather events and climate change, conclusions which we also believe to be emerging from the draft AR6 Report.

Objective science and all the above observations do not point to a climate emergency.

As a reality-check on mitigation, the COVID-19 pandemic reduced global GHG emissions by about 7% in 2020, which reduction had no perceptible influence on global CO₂ concentration (as per Mauna Loa data), and by implication, had no influence on climate; this is consistent with the fact that anthropogenic CO₂ is only a very small part of the natural CO₂ cycle. Hence the proposed 50% reduction in Irish GHG emissions by 2030, if ever achieved, would have an imperceptible impact on climate (a general point which we also understand is being made in the IPCC draft AR6 Report).

A corollary is that there are no costs for mitigation "inaction". On the positive side, slightly increasing CO₂ levels enhance photosynthesis and are measurably greening the planet (ref www.CO2science.org), and is also helping increase global food production.

While mitigation is for now (unfortunately) mandated by international protocols, national mitigation action should therefore, we suggest, focus primarily on the socio-economic benefits. Prudent adaptation to whatever modest climate change occurs in the decades ahead would indeed make more sense.

Q2. Have the real implications of the proposed 2030 mitigation target been considered?

We see little account being taken of the real technical implications of the proposed policies.

On electricity supply, if operating on 70% average renewable generation (implying towards 100% at times) in what is effectively an Irish island grid could pose significant risks of blackouts (like those experienced in Texas, California, UK and South Australia).

Gas-fired open and closed-cycle turbines will be needed to maintain grid stability at all times as well as providing continuity in times of low or no wind or solar. Electricity interconnectors are no panacea as these can be subject to technical reliability issues as well as politically-driven interruptions. Indigenous gas supply is rapidly depleting and the UK gas interconnectors will be a less reliable source as North Sea fields deplete. In that context, it is inexplicable to contemplate banning the construction of an Irish LNG import facility.

Increased electrification of transport and building heating could approximately double the total load on the electricity network; it seems not yet appreciated that to accommodate this higher loading and proposed higher levels of renewable power, the transmission and distribution grids would need major costly and disruptive (over-ground and underground) reinforcement and upgrading.

These technical challenges are well analyzed in three recent IAE Reports
"The Future of Electricity Transmission in Ireland", Briefing Paper, October 2020, see:
<http://iae.ie/wp-content/uploads/2020/10/The-Future-of-Electricity-Transmission-in-Ireland.pdf>.
"National Energy and Climate Plan – the Challenges of High Levels of Renewables in the Irish Electricity System", March 2021, see:
http://iae.ie/wp-content/uploads/2021/03/IAE_Challenge_HighLevelsofRenewables-1.pdf.
"Natural Gas, Essential for Ireland's Future Energy Security", July 2018, see:
http://iae.ie/wp-content/uploads/2018/08/IAE_Natural_Gas_Energy_Security.pdf.

Incidentally, the electrification of transport and heating will reduce national fuel diversity and introduce new supply disruption risks, which have yet to be evaluated; have the fuel diversity lessons of the 1970s been forgotten?

In the transport sector, Electric Vehicles (EVs) can improve urban air quality, but battery production contains embedded carbon equivalent to 50,000km to 100,000km of fuel use in an ICE conventional vehicle. EVs are by no means "carbon free" even if charged from renewables. There are also serious questions of cobalt/lithium supply chain availability and sourcing ethics, as also in post-use EV battery recycling. It would seem more sensible to allow continued customer choice as vehicle drive train ICE/hybrid/EV technologies evolve.

The deep retrofitting of dwellings and installation of heat pumps are laudable, but have a long payback time and may be therefore unaffordable to most. Many older buildings are so poorly insulated that incentivised partial retrofitting or new-build may be better solutions. Actions in improving insulation do have significant comfort and health benefits, so a determined roll-out is highly desirable. Natural gas will continue to be an optimal heating fuel (also as a necessary winter-time supplement to heat pumps); proposals to convert to hydrogen fuel at a domestic level do not make sense.

Larger and mid-sized industries have generally invested in increasing energy efficiency to maintain international competitiveness in recent years; smaller enterprises will require increased incentives to achieve optimal energy performance.

Agriculture is laudably committed to being more efficient in every aspect, and is inherently more sustainable in Ireland's temperate climate. There is emerging evidence that the GHG/GWP metric currently used to calculate equivalence between CH₄ (methane) and CO₂ is significantly over-rated. In addition, pioneering research by Happer and Van Wijngaarden shows that CH₄ is nearly irrelevant to global warming (ref: <http://co2coalition.org/?s=methane+and+climate>).

Carbon capture technology is extremely expensive and unproven with associated geological risks.

Overall, we believe that these practical technical issues, and the very significant associated costs, have not yet been adequately addressed in the proposed climate action policy.

Q3. Can Ireland actually afford the proposed 2030 mitigation ambition?

As far as ICSF is aware, there have been no Government estimates on the costs of the 2030 climate ambitions. We wonder how climate legislation can be constitutionally implemented without adequate cost/benefit analysis.



The 2017 cost estimates by the Irish Academy of Engineering (IAE), in its Report *"Ireland's 2030 GHG Emissions Target - an Assessment of Feasibility and Costs"* partially-costed the then-proposed 30% reduction in emissions at ~€35 billion, ref:

http://iae.ie/wp-content/uploads/2017/07/IAE_Report_-_Irelands_2030_Greenhouse_Gas_Emissions.pdf.

In 2020, the MaREI/EAI *"Our Zero E-Mission Future"* Report estimated the proposed 2030 energy transition costs at €63 billion, ref:

<https://eaireland.com/wp-content/uploads/2020/11/Our-Zero-e-Mission-Future-Report.pdf>,

though this too excluded other aspects of meeting the proposed 50% GHG reduction target.

ICSF estimates the cost of achieving the 50% reduction goal, assuming it could be achieved, as likely exceeding €100 billion (including the necessary grants and subsidies), equating to a cost of ~€20,000 per person, or ~€50,000 per household between now and 2030. This would be in addition to major increases in consumer utility costs, as yet unquantified, but already emerging.

Achieving the proposed 50% GHG emissions reduction by 2030 would, it seems, almost inevitably require reduction in agricultural activity, closure of some industries, energy rationing, curtailment of lifestyle, societal disruption and job losses. There is no scientific basis to have to impose de-growth.

The Climate Action Plan 2019 (now outdated) included in its Figure 4.2 a marginal abatement cost curve for the then 2030 ambitions. While it shows theoretically-negative abatement costs for many initiatives, these refer to the economic benefits, many over a long timescale. This data does not show the real cash costs to Irish taxpayers and consumers between now and 2030.

We conclude that the Government is not telling the electorate what climate action to 2030 is really going to cost them.

The "Net-Zero 2050" ambition costs are as yet simply unquantifiable, and are certainly unaffordable.

Conclusion

We respectfully suggest that the answers to our three questions above are "no". Therefore we believe that reality checks in all three areas are needed before setting national climate policy.

We in ICSF wish for a sustainable future, but climate policy should not be a knee-jerk reaction to an imagined climate emergency. Instead, it should be based on prudent energy conservation with optimal adaptation to whatever climate trends emerge in the coming decades, with due allocation of scarce national post-pandemic resources to pressing needs in healthcare, wellbeing, housing, infrastructure upgrades, youth employment and poverty alleviation.

We look forward to being heard.

Yours sincerely,

A handwritten signature in black ink is written over a thick black horizontal redaction bar. Below this bar is another thick black horizontal redaction bar, which appears to be the name of the signatory.



GFI Europe (Belgium) ASBL, Drève du Pressoir 38, 1190,
Forest, Belgium

Public Consultation on the Environmental Assessment of the Draft Agri-Food Strategy to 2030 submitted by The Good Food Institute Europe

14/06/2021

Ireland should become a world leader in plant-based and cultivated meat

We welcome the Environmental Assessment of the draft Agri-Food Strategy to 2030 and applaud the Irish Government's efforts to create a more healthy and sustainable food system which is embedded in the bioeconomy.

Plant-based and cultivated (cell-cultured) meat, eggs, dairy, and seafood, as well as fermentation derived products, are better for the environment, public health, and animal welfare than their animal-based counterparts and offer significant opportunities to reduce reliance on imported protein as well as boosting the horticulture sector. Therefore, the Irish Government should heavily invest in research and innovation to make these products equally delicious, price-competitive, and convenient for consumers.

Plant-based and cultivated meat are crucial components to create a healthy and sustainable food system and can deliver on the objectives of the Agri-Food Strategy to 2030 by:

- **Mitigating climate change:** Plant-based meat products create 30-90% less greenhouse gas (GHG) emissions than their conventional meat counterparts while cultivated meat can reduce GHG emissions by 92%. Shifting to more plant-based and cultivated meat would thus help Ireland reduce its biogenic methane emissions and therefore fulfil its obligations under the Paris Agreement.
- **Fighting biodiversity loss:** Plant-based and cultivated meat products require just a fraction of the crops that are needed for conventional meat production (reducing land-use by up to 97%). Relieving pressure on forests and other habitats that are under threat of destruction for growing animal feed crops would preserve or even increase biodiversity, as well as having cross-benefits for climate change mitigation by freeing up land for carbon sequestration. Reducing GHG emissions while freeing up land also fits hand in hand with a push away from intensive farming and towards premiumisation of animal based products.

Creating a sustainable, secure, and just food system.

- **Address public health crises:** The Covid-19 pandemic has revealed the fragility of our food system and the links between zoonotic diseases and intensive animal agriculture. Not only will increasing the uptake of plant-based and cultivated meat reduce the risk of future pandemics, it can also address antimicrobial resistance as it requires no antibiotics.

The opportunity is now

Until recently, plant-based meat has often been simplistic offerings such as tofu and black bean burgers that don't satisfactorily replicate the organoleptic experience of animal-based products. Recent technological advancements and a greater understanding of the biological components of food have resulted in a new capability to biomimic animal-based products. This is a step-change and opens up a range of new possibilities. These products that biomimic animal meat in terms of taste, texture, and nutrition, offer a real possibility to appeal to flexitarians. Further public funding of research and innovation is needed to bring these products as close as possible to animal-based meat, in terms of taste, price, and nutrition.

Last December Singapore became the first region to approve cultivated meat for sale, and several other regions are poised to make similar announcements. To date there are 76 companies working on a range of diverse products such as beef, chicken, pork, steak, and salmon with many ready to come to market. With private sector investment booming, the key technological challenges have been solved but significant gaps remain in scaling up and bringing down costs. With its strong concentration of researchers working in adjacent fields, such as tissue engineering, Ireland is uniquely placed to take a lead in cultivated meat research and innovation.

We thus urge the Irish Government to include provisions for research and innovation for the plant-based and cultivated meat, eggs, dairy, and seafood, and fermentation sectors as part of the draft Agri-Food Strategy to 2030. Progress in the development of these products is necessary to deliver nutritious, safe, and affordable alternatives to conventional animal-based food and to meet the Paris Agreements.

The Good Food Institute Europe has conducted extensive mapping of the technological and value chain gaps which will benefit from further research and innovation. These 'Solutions' are available on our open-access [Advancing Solutions for Alternative Proteins](#) database. For more detailed information on these research priorities or for anything else in this letter, please reach out to [REDACTED] at the Good Food Institute Europe, at [REDACTED]

Thank you for considering our submission.
www.gfi.org



An Roinn Talmhaíochta,
Bia agus Mara
Department of Agriculture,
Food and the Marine

Public Consultation on the environmental assessment of the Draft Agri-Food Strategy to 2030

Fields marked with * are mandatory.

Introduction

Background

Ireland's agri-food sector has benefited from an approach to strategic policy planning whereby sector-led strategies are developed every 5 years. The Minister for Agriculture, Food and the Marine convened a Committee representative of the sector to develop an agri-food strategy to 2030, with their terms of reference being to outline the vision and key objectives, with associated actions, required to ensure the economic, environmental and social sustainability of the agri-food sector in the decade ahead. To ensure that environmental considerations are fully integrated into the preparation of the Strategy, a Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) has been conducted in parallel with the work of the Committee.

The Department has procured RSK Ireland Limited to carry out a Strategic Environmental Assessment of the likely significant effects on the environment of implementing the 2030 Agri-Food Strategy.

The environmental assessment has been carried out in accordance with EU Directive 2001/42/EC and the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (SI 435 of 2004), as amended.

In addition, the consultants have been asked to undertake an associated Appropriate Assessment (AA) Natura Impact Statement pursuant to Article 6 of Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora as transposed into Irish law by S.I. 477/2011 the European Communities (Birds and Natural Habitats) Regulations 2011.

Terms and Conditions

The Department of Agriculture, Food and the Marine is collecting this data to inform the Environmental Assessment process as part of the development of the Agri-Food Strategy to 2030. All submissions, including the name of the person or organisation making the submission, will be shared with our external consultants who are conducting the Strategic Environmental Assessment and Appropriate Assessment on our behalf. All submissions, including the name of the person or organisation making the submission, will

be published on the Department's website, however, if you wish to make a submission but not be identified publicly this can be accommodated provided it is clearly indicated when the submission is made.

Freedom of Information

All submissions and comments submitted to the Department for this purpose are subject to release under the Freedom of Information (FOI) Act 2014 and the European Communities (Access to Information on the Environment) Regulations 2007- 2014. Submissions are also subject to Data Protection legislation.

Personal, confidential or commercially sensitive information should not be included in your submission and it will be presumed that all information contained in your submission is releasable under the Freedom of Information Act 2014.

Data Protection

The Department of Agriculture, Food and the Marine is collecting this data to inform the Environmental Assessment process as part of the development of Agri-Food Strategy to 2030. All submissions, including the name of the person or organisation making the submission, will be shared with our external consultants who are conducting the Strategic Environmental Assessment and Appropriate Assessment on our behalf. This data will be processed in accordance with the EU General Data Protection Regulation (GDPR EU 2016 /679), the Data Protection Acts 1988-2018, the Freedom of Information Act 2014 and the DPER Consultation Principles and Guidance. Any additional personal data received as part of your submission will not be processed, shared, or retained and will be destroyed upon receipt. Further information on Data Protection can be found on our website <https://www.gov.ie/en/organisation-information/ef9f6-data-protection>

The Department of Agriculture, Food and the Marine is committed to protecting and respecting your privacy and employs appropriate technical and organisational measures to protect your information from unauthorised access. The Department will not process your personal data for any purpose other than that for which they were collected. Personal data may be exchanged with other Government Departments, local authorities, agencies under the aegis of the Department, or other public bodies, in certain circumstances where this is provided for by law. The Department will only retain your personal data for as long as it is necessary for the purposes for which they were collected and subsequently processed. When the business need to retain this information has expired, it will be examined with a view to destroying the personal data as soon as possible, and in line with Department policy.

Your Details

* Forename:

* Surname

* Country

* How would you best describe yourself?

- Farmer
- Fisher
- Forest Owner/Manager
- Engaged in employment in the food and drink industry
- Engaged in employment in other business/industry
- Representative of a farm/seafood/forestry organisation
- Representative of a civil society/NGO
- Representative of an employer organisation or trade union
- Advisor/Consultant
- Researcher/Academic
- Representative or working in a Public Body
- Member of the Public
- Other (please specify in box below)

Please specify here

* Please indicate if you are submitting your proposal on behalf of;

- an organisation
- as an individual

Name of Organisation

* Please choose from options below to indicate whether you wish to have your name published on the Departments website alongside your submission

- My name can be published
- I do not wish to have my name published

Questions

Q1. Do you have any observations on the conclusions in the Environmental Report and Natura Impact Assessment?

5000 character(s) maximum

VistaMilk has outlined three strategic goals to guide the research carried out within the centre. The three strategic goals are Sustainability, Food Security, and Prosperity and Societal Enrichment which align closely to the United Nations Sustainable Development Goals (SDGs) and the European Green Deal with a focus on areas of critical importance such as food security, climate change, and biodiversity.

This balanced approach is in-line with Alternative 3 as laid out in section 5.3 of the Environmental Report of Agri-Food 2030. VistaMilk believes that this balanced strategy is the most suitable going forward as it correctly prioritises the actions that need to be taken to address climate change and biodiversity challenges while recognising the potential impacts that some actions may have on the sustainability of rural Ireland.

Q2. Having reviewed the Environmental Report, please provide comments on individual sections in more detail. Please ensure to state clearly the section of the Environmental Report and page number (if relevant) that your comment or submission relates to.

5000 character(s) maximum

Mission 1, Goal 1, Action 5.

A key part of addressing the climate challenge will be to fully understand the impact a variety of factors play in the volume of greenhouse gasses both emitted and sequestered by agricultural practices. This will require significant investment from both government and industry and the establishment of collaborative projects that exploit the expertise of all stakeholders. An example of this is the VistaMilk project in conjunction with SFI and Dairy Research Ireland which is investing €1.4m to put in place a network of covariance towers that will measure the greenhouse gas emissions from Irish grasslands and the impact of management practices on those emissions. The findings from this research will instruct future policy on grassland management and will set Ireland out as a leader in this area. This project should be a template for co-operation between government and industry.

Carbon sequestration alone will not allow agriculture to reach the emission reduction targets set out for it by the government. Emission reduction strategies will also play a key part in achieving the reductions required. Identifying and verifying these technologies so that they can be included in national greenhouse gas inventories will require a significant investment by all stakeholders. An example of this is the research being carried out in VistaMilk in to a variety of complimentary feeds with the potential to reduce emissions from livestock. The technology required to carry out this research represented a significant investment for the research centre but for Ireland to lead in understanding and addressing greenhouse gas emissions from livestock systems, this investment will need to be repeated across the research sector.

Mission 3, Goal 3, Action 2.

As health research continues to identify nutrition challenges, functional foods will play a significant part in providing solutions to some of these problems. Dairy products have long been identified as a vehicle for nutritional foods which provides significant opportunities for Irish food producers. However, as consumer values change, their demands of the food they consume have increased. Therefore significant emphasis must be placed in the research which will confirm the health benefits coming from these functional foods. The development of personalised nutrition will also help to address public health-related and ageing population challenges, as well as the potential to lead to optimised human health and performance.

Mission 4, Goal 2, Action 3.

Agri-tech is a relatively young sector and there is huge potential for growth in the area. However for the

potential to be realised, the level of expertise in both academia and industry must be broadened and deepened. Vistamilk believes that a greater connection between academia and industry will deepen the level of expertise in the Irish agri-tech sector. VistaMilk will provide postdoctoral training or employment directly to more than 100 people over the duration of Phase I of the Centre. This will ultimately lead to a generation of new researchers in the agri-tech and food area, many of whom will take up employment in industry. A further avenue for creating closer relations between academia and industry is the development of large scale collaborative projects where industry and academia develop research projects with objectives aimed at addressing the challenges facing agriculture.

Mission 4, Goal 2, Action 3.

As the amount of technology being utilised on Irish farms increases, significant volumes of data is being generated which has raised questions around data ownership and governance. Irish farmers are being encouraged to utilise increasing levels of technology on-farm so the levels of data generated will continue to increase leading to an urgent requirement for these questions to be addressed. For the benefit of the wider sector there should also be a focus on the integration of as much of this data as possible. Integrating these data sources will require collaboration across a wide range of stakeholders. Government must provide funding to explore the various enabling technologies for example Block-chain and how they can be utilised to provide maximum transparency while facilitate the correct data governance requirements. Deployment of these technologies will be very dependent on the trust the sector have in these technologies so this must be a key priority within the strategy.

Q3. Having reviewed the Natura Impact Assessment, please provide comments on individual sections in more detail. Please ensure to state clearly the section of the Natura Impact Assessment and page number (if relevant) that your comment or submission relates to.

5000 character(s) maximum

N/A

Q4. Is there any additional information which in your view should be considered in the Environmental Report and/or the Natura Impact Assessment? Please specify.

5000 character(s) maximum

N/A

**Q5. Are there additional mitigation/monitoring measures that you would like to propose?
Please specify.**

5000 character(s) maximum

Q6. If you wish to make comments on the draft 2030 Agri-Food strategy, please ensure to state clearly the section of the draft Strategy and page number (if relevant) that your comment or submission relates to.

5000 character(s) maximum

Additional Supporting Information

If you have supporting documents, please upload here.

where possible, please limit supporting document to under 5000 words

To whom it concerns,

I am writing this mail in response to a call in the Farmers Journal for feedback on the Agri-Food Strategy 2030, specifically 'National Herd and Biogenic Methane'.

My principal driver for sending this mail is a concerned Irish citizen. I strongly believe that the strategy being discussed in relation to limiting the national herd size is wrong.

I've 20+ years' experience of deploying IT systems into some of the world's largest manufacturing companies. I have learned that metrics matter, once they are the right metrics! It is my opinion, rather than looking at the size of the national herd as a metric, focus should be placed on animal efficiency; different cattle, different milk yields, different GHG emissions, different feed conversion rates.....

In 2019 I could see this writing on the wall and decided I would start researching if an efficient method of measuring cattle efficiencies existed or could be developed. For the past year and a half, I have taken time away from work to investigate this. In mid-2020 I formed a partnership with <https://moonsyst.com/home> to use their IoT Technology to potentially measure eructations (or belches) from cattle. Cattle that eructate a lot, are cattle that (driven by either genetics or feed) have poor feed conversion, health issues and produce excessive GHG emissions. A healthy rumen will equal a healthy cow, but if you cannot measure it, you cannot improve it!

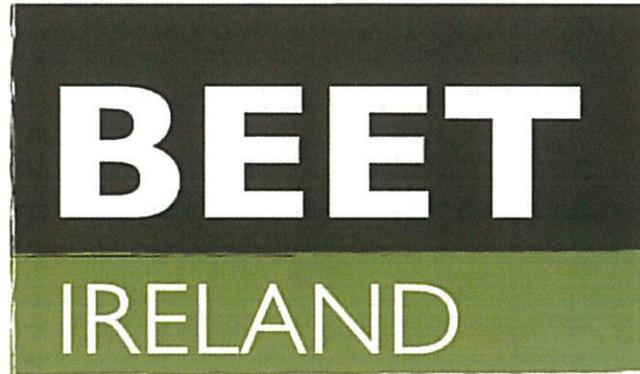
I have already reached out to; Cork North and West LEO, Enterprise Ireland, Teagasc (Moorepark & Grange), Tyndall and UCD to name a few to work on turning this concept into a reality. I am in the process of setting up a new entity 'Moonsyst International Limited' that will become HQ for Moonsyst globally.

As part of the Agri-Food Strategy 2030, I feel Ireland should focus on animal efficiency in producing high quality animal protein i.e. milk and meat, not herd(s) size. The demand for milk and beef is expected to grow constantly for a least 30 years, as more people around the world become middle class and seek these proteins in their diet. Ireland has one of the most natural and best systems for producing milk and meat in the world. If we do not serve the increasing global demand, some other country will, where animal welfare and sustainability will not be as good as Ireland's, therefore having a gross negative impact on sustainability and the environment. In accordance to the Paris Climate Agreement, Article 2.1 of the Agreement mentions the importance of protecting food production while reducing emissions. I strongly feel Ireland is best positioned to do this, by being a world leader on meat and dairy efficiencies, not by simply limiting or reducing the national herd, we are better than that. Let's not throw the baby out with the bath water!

Thank you for considering my point of view and hopefully I have conveyed that I feel so passionately about this, I have put my career on hold to try find a solution. I would be happy to discuss my background and ideas further if appropriate.

Your sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



Submission
to
Draft Agri-Food Strategy 2030

June 2021

BEET IRELAND
c/o Country Crest,
Rathmooney, Lusk, Co. Dublin

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Introduction

Beet Ireland welcomes the opportunity to make a submission regarding the future Agri-Food Strategy for Ireland. The changing nature of the industry with regard to climate change and Brexit means that this review is timely but also very challenging with regard to charting the correct course for the industry. We set out a policy context below and then make specific comments regarding the Draft Agri-Food Strategy 2030 document that is the subject of the current consultation.

The backdrop to the current review is the “FoodWise 2025” strategy which proved to be a flawed strategy, lacking balance across the industry and failing to recognise the environmental impacts of the proposals. It is clear that the importance of climate change is now being prioritised in line with 2030 and 2050 climate change targets however hard decisions must be made if these targets are to be met. Agriculture can play a key role in climate change providing there is a balanced strategy that recognises the importance of sustainability and the role that renewable energy and the circular economy can play going forward.

The current range of Government policies as noted below are prioritising the following:

- Delivery on climate change targets
- Expanding and promoting renewable energy opportunities at all levels across society
- The importance of sustainable rural development and creating new business models that deliver sustainable opportunities
- The need to implement regional policies that will spread economic benefits across the country
- Maximising the benefits to be gained from our existing infrastructure especially the motorways as a lever for economic development
- Expanding circular economy opportunities across the economy, however this presents particular opportunities for the agri-food sector
- Building sustainable and resilient food models

Draft Agri-Food Strategy 2030 Consultation

The consultation document sets out four high-level missions in order to create a sustainable food system that will deliver positive or neutral impact on the natural environment i.e. environmental sustainability.

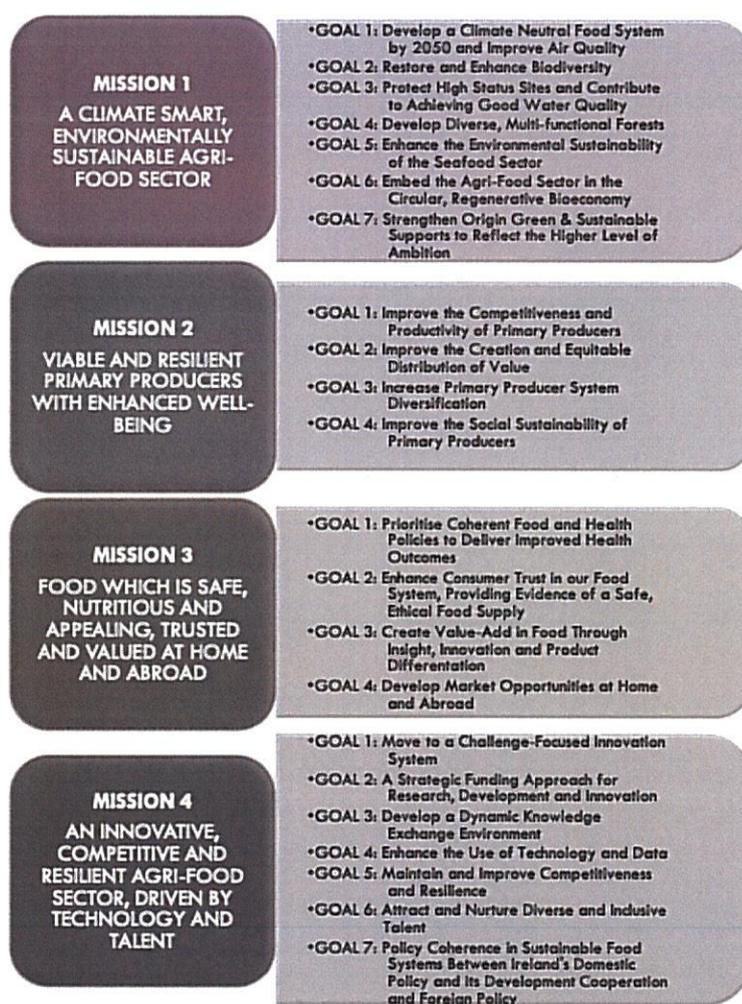
In this regard it is clear that the global concerns regarding climate change are having direct impact on all Government policies and the agri-food industry must play its role in bringing about positive change. However key trends and issues must be addressed if a 2030 strategy is to work and be effective i.e.

- There is an over-indexing on animal based agriculture in the current industry model
- There is a clear consumer move towards plant based diets
- New alternative models of agriculture are needed that will present greater balance and integration across the various sectors of Irish agriculture
- There is a need for positive policy frameworks that support and expand the tillage and horticultural sectors as well as ensuring that agriculture plays a stronger role in

the generation of renewable energy. Such opportunities will lead to a broader range of income streams for primary producers i.e. “full-spectrum producers”.¹

- New value added tillage hubs are supported and developed that will drive the value added opportunities for tillage
- Proposals on Environmental Measures of **The Proposed CAP (ECO SCHEMES)** must also be reflected in this longer term plan, for specific tillage/ horticulture farmers, as follows . i.e., coupled area-based support payments like the existing mandatory greening measures of Current CAP including 3 crop rule, Glas schemes including cover crops, min-till and direct drilling, buffer field margins and EFAS.
- Optional additional biodiversity coupled payments, such as protein payments and straw chopping schemes currently being operated as pilot schemes.
- Ring fencing existing arable area base similar to original E.U. Mc Sharry CAP reforms of 1992.

The draft document sets out four pillar missions as follows:



The document sets the following key targets:

¹ Future Forces, A ten-year horizon for Australian agriculture, agrifutures.com.au

- *Coherence of policies for food, health and nutrition, nationally, at the EU level and through international policy generally.*
 - *Co-ordinate national policies for food, health and nutrition*
 - *Better labelling and reformulation for healthier diets.*
- *Enhancement of consumer trust through providing evidence of safe and ethical food production.*
- *Creation of value-add, through insight and innovation, supporting the food sector and continuing to develop market opportunities at home and abroad.*
 - *Sustainably develop Ireland's food and drink offering, with new ambition for value-add and new markets with a view to agri-food exports reaching €21 billion by 2030.*

While the above targets are desirable, it is unclear from the consultation document as to what the Agri-Food industry will look like in 2030 and how the individual components and sectors will develop. The last target references exports reaching €21 billion by 2030 however the document does not explain how this figure is made up or what are the projections for the domestic market. In this context it is not clear who the winners and losers are projected to be over the coming years.

Key take-outs from the document include the following:

- Both the tillage and horticultural sectors are recognised as being “the most carbon efficient sectors of Irish agriculture” and consequently “it is important that the area under cultivation in these sectors is at least retained, with an ambition to increase both.”
- Growth potential is identified in the value added sectors such as high value output to the distilling and brewing industries, high value food markets such as oats, oils and salad and chipping potatoes as well as protein crops to supply demands of the livestock diets.
- The importance of innovation in the development of value-added functional foods and ingredient solutions.
- The importance of measures to increase carbon sequestration and scaling up of renewable energy sources, “through anaerobic digestion, solar energy and greater energy efficiency.”

This strategy will be a key influencer of the grants and business supports that will be needed to drive the overall targets for 2030. It is clear that renewable energy can play a significant role in the delivery of Ireland's climate change targets however this potential will not be able to be realised if the renewable energy opportunities presented by the circular economy e.g. anaerobic digestion are not commercially feasible.² The 2030 strategy must therefore ensure that the target of “sustainability” can become a widespread commercial reality across our rural communities. Currently the opportunities presented for the production of biofuels and anaerobic digestion are not broadly commercially available due to the absence of a supporting policy framework.

² “Opinion: Ireland can be a leader in biomethane-so what's the hold up?, Irish Farmers Journal, 7th June 2021

If the tillage and horticultural sectors are the most carbon efficient sectors in the industry, they must be supported by a range of policies that will significantly expand these sectors over the next decade. In this context it is recommended that the tillage sector should be targeted for a 20% expansion in production at farmgate as well as 40% increase in value added for the sector (in real terms).

The expansion in horticultural sector is being limited by both energy costs and the high capital cost for entry to the protected crops sector. The combination of renewable energy investment in combination with significant horticultural capital investments have the potential to reposition Ireland's horticultural industry. Against this backdrop it is recommended that a 30% farmgate expansion target is set for horticultural output in real terms. The horticultural industry has the potential for significant growth when aligned with significant renewable energy and circular economy projects.

Current Government Policy Framework

Recent months have seen the introduction of a range of important policy documents that provide a framework for the discussion around Ireland's Agri-Food Strategy. The policy scope includes, climate change and agriculture, rural development, regional opportunities, foreign direct investment and the circular economy, as outlined below.

Ag Climatise - A Roadmap towards Climate Neutrality

The Ag Climatise Roadmap³ was published in December 2020 following a consultation process by the Department of Agriculture Food and Marine. This roadmap is framed by Climate Action Amendment Bill 2020 which set the objective of achieving a "climate neutral economy" by 2050 and beyond. This overarching objective, is in line with international global commitments under the "Paris Agreement" and has far reaching implications for every sector of the Irish economy.

The role of agriculture is noted as "the single largest contributor to overall emissions at 35% (2019 Provisional EPA report) of the total. At the same time, the agriculture and land use sector (including forestry) has a key role to play in developing renewable energy systems and in sequestering carbon from the atmosphere." In order to address this challenge the roadmap sets the following tasks:

1. *Reduce GHG emissions from the sector. Methane from enteric fermentation and nitrous oxide are the dominant GHGs from agriculture.*
2. *Increase the carbon sequestration and carbon storage potential of Ireland's land use sector.*
3. *Reduce nutrient loss to the environment and contribute to improved water quality and biodiversity.*
4. *Meet our ammonia emissions reduction targets.*
5. *Build sustainable, resilient food production and land use management systems that meet these climate and environmental obligations, while also meeting market expectations.*
6. *Transparently communicate our progress; our Origin Green programme can play a key role in this regard.*

³ A Roadmap towards Climate Neutrality, Department of Agriculture, Food and the Marine, December 2020

Significantly the policy notes that “The tillage and horticulture sectors are the most carbon efficient sectors of Irish agriculture, hence it is important that the area under cultivation in these sectors is retained, at a minimum, or indeed increased.” In this context the importance of promoting the development of a sustainable circular bioeconomy is a specific proposed action needed to deliver on the overall climate change targets (Action 12). Beyond the bioeconomy, the roadmap recognises that “the agriculture sector has a key role to play in helping Ireland meet its energy efficiency and renewable energy targets. In addition, adoption of energy efficiency and renewable technology generation can enhance the green image of the agri-food sector both nationally and globally.” Action 18 sets the following targets to “Generate at least a 20% reduction in agricultural energy use by 2030 across all farms. In addition, generate at least 20% deployment of renewable energy technologies focusing primarily on energy intensive farming systems.” In setting this target the Department of Agriculture Food and Marine is seeking to ensure that its various support programmes maximise the uptake of energy efficiency and renewable energy deployment at farm-level.

Minister Charlie McConalogue T.D. summarised the overall challenge as:

“In the medium to longer term, a significant cut in biogenic methane emissions will be needed to negate the global warming impact of biogenic methane. Developments in technology (e.g. breeding and feed additives) can underpin this required reduction. Other agricultural emissions of nitrous oxide (including emissions from animals grazing at pasture, manure management and fertiliser application) will need to be offset by removals, and agriculture can also make a substantial contribution to renewable energy.”

Our Rural Future, Rural Development Policy 2021-2025

Our Rural Future⁴ policy document provides a comprehensive framework for development of Ireland’s rural economy and community. It notes that “The Green Economy presents significant potential for employment opportunities for rural areas as Ireland transitions to a low carbon, climate neutral future.” It maps out the opportunities presented for renewable energy and the bioeconomy and circular economy in Ireland. The following policy measures are specifically noted:

21. Develop and implement a set of nine new Regional Enterprise Plans to support enterprise development and jobs growth in the regions.

23. Deliver ambitious job creation and enterprise development targets for the indigenous sector in the strategies of Enterprise Ireland, Údarás na Gaeltachta and the Local Enterprise Offices to embed jobs growth more deeply within the regions.

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25. Promote awareness and the use of remote working hubs and enterprise centres across the country to support remote working and encourage local enterprise start-ups

⁴ Our Rural Future Rural Development Policy 2021-2025, Department of Rural and Community Development, 2021

26. *Maximise our resources and strengths in the Green Economy to support employment opportunities for rural communities in areas such as renewable energy, sustainable tourism, energy retrofitting, the Bioeconomy and the Circular Economy.*
28. *Develop an overarching Clustering Policy and Framework to advance strong and effective clustering and links between SMEs, multinational corporations and the third-level sector.*

The roadmap notes that “While Ireland faces unprecedented economic change over the next decade in the transition to a low carbon economy, rural areas can have a strong involvement in this transition by building on their natural assets to contribute to renewable energy generation, carbon sequestration through afforestation and rewetting of bogs, sustainable land use, smart farming, and the creation of job opportunities in emerging sectors and green technologies.” In this context it sets the following policy measures:

107. *Enact and implement the Climate Action and Low Carbon Development (Amendment) Bill and set five-year carbon budgets to contribute to meeting Ireland’s target of net zero emissions by 2050.*
110. *Enable community energy to play a role in reaching the target of generating at least 70% of electricity through renewables by 2030, through supports such as a Community Benefit fund and a community category within the Renewable Electricity Support Scheme.*
111. *Prioritise the development of microgeneration of renewable electricity, allowing people sell excess power back to the grid, through the establishment of a Microgeneration Support Scheme.*
112. *Expand the Sustainable Energy Communities Network from 500 to 1,500 by 2030, to support local communities to be directly involved in energy projects*

It is noted with regard to climate change that “Society has a shared responsibility to realise this ambition and the Agriculture sector is committed to playing its part, while also taking advantage of the many sustainable opportunities that this transition can present.”

Regional Policy Framework

Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031

The EMRA Regional Spatial & Economic Strategy (RSES) sets out preferred scenarios as follows:

Selection of preferred scenarios for Eastern & Midland RSES	
TYPE	PREFERRED SCENARIO
1. Spatial Strategy	The optimum spatial strategy combines the growth of Dublin and regional centres with a selected number of large self-sustaining settlements that have the assets and capacity to grow in a sustainable manner while minimising impacts on the receiving environment. This option offers the best opportunity to align services with population and economic growth , promote compact growth in urban settlements and make the best use of infrastructure including public transport thereby reducing transport emissions and improve regional accessibility .

2. Climate and Biodiversity	Current trends indicate that implementation of existing national policies alone will not be sufficient to meet climate targets therefore additional measures are required. The preferred scenario combines this with complementary approaches including the development of a regional Green Infrastructure and ecosystem services approach together with site-based alternatives for adaptation/mitigation of impacts in strategic development locations.
3. Economic Strategy	The preferred Economic Strategy promotes smart specialisation strategies based on identified strengths and competitive advantages , combined with cluster policies that promote economies of scale and network effects in certain locations. The Strategy should also support diversification of local economies and development of innovation and entrepreneurial ecosystems for sustained national growth that can withstand external shocks .

The EMRA RSES identifies a range of growth enablers for the region including:

- *Promote balanced growth in a limited number of economically active settlements which have the identified capacity and potential for self-sustaining growth.*
- *Promote regeneration and revitalisation of small towns and villages and support local enterprise and employment opportunities to ensure their viability as service centres for their surrounding rural areas.*
- *Support rural areas by harnessing natural resources to develop renewables, recreation and tourism opportunities including green infrastructure planning and the development of an integrated network of greenways, blueways and peatways.*

Specific growth enablers for the Gateway Region include the following:

- *Regeneration of small towns and villages, with a focus on the identification of rural town, village and rural regeneration priorities to bring vibrancy to these areas.*
- *Diversification and growth of smart specialisation of local economies with a strong focus on clustering including sustainable farming and food production, tourism, marine, energy and renewables, bioeconomy and circular economy, with a focus on publicly owned peatlands in the midlands, to support a 'Just' transition and realise the benefits of green technologies.*
- *Promote the Region as a key destination for tourism, leisure and recreation activities and support the development of an integrated network of greenways, blueways and peatways while ensuring that high value assets and amenities are protected and enhanced.*

The EMRA notes that in applying the core strategies and settlement hierarchies, local authorities should consider the following growth enablers. The growth enablers with specific relevance to the proposed Sustainable Agri-Food Hub are bolded.

- **Economic growth**
- **Align population, employment and housing growth**
- **Compact sustainable growth**
- **Regeneration and development**
- **Strategic connectivity**
- **Dublin-Belfast Economic Corridor**
- **Healthy placemaking**
- **Climate action**
- **Collaboration**

With regard to regional policy objectives (RPO) for rural areas, RPO 4.79 states:

*Local authorities shall identify and provide policies that recognise the contribution that small towns, villages and **rural areas contribute to social and economic wellbeing**. As part of this policy provision that seeks to **support and protect existing rural economies** such as valuable agricultural lands to **ensure sustainable food supply**, to protect the **value and character of open countryside** and to **support the diversification of rural economies to create additional jobs** and maximise opportunities in **emerging sectors**, such as **agri-business, renewable energy, tourism and forestry enterprise** is supported.*

IDA Regional Strategy 2021-2024

The IDA strategy for 2021-2024⁵ places particular emphasis on the importance of regional investment based on sustainable growth. It notes that “*Regional development is at the centre of IDA’s new strategy. IDA is committed to the pursuit of more balanced, compact regional development which can deliver complementary efficiency and equity gains, with the overall impact of helping to advance national development*”.

The IDA are targeting 50% of their investments to be located in the regions. The importance of sustainability, new business models and supply chain reconfiguration are all recognised as emerging trends within the investment market. While renewable energy is identified as one of the areas of opportunity in line with the sustainability pillar, the IDA has also set a target of 60 sustainability investments. The five pillars underpinning the strategy are Growth, Transformation, Regions, Sustainability and Impact as illustrated below.

FIGURE 10 IDA STRATEGY 2021-2024

⁵ Driving recovery & Sustainable Growth Strategy 2021-2024, IDA Ireland

Over the period 2021-2024 IDA Ireland will:

WIN 800 TOTAL INVESTMENTS TO SUPPORT JOB CREATION OF 50,000 AND ECONOMIC ACTIVITY

PARTNER WITH CLIENTS FOR FUTURE GROWTH THROUGH 170 RD&I AND 130 TRAINING INVESTMENTS

WIN 400 INVESTMENTS TO ADVANCE REGIONAL DEVELOPMENT

EMBRACE A GREEN RECOVERY WITH 60 SUSTAINABILITY INVESTMENTS

TARGET A 20% INCREASE IN CLIENT EXPENDITURE IN IRELAND TO MAXIMISE THE IMPACT OF FDI



Whole of Government Circular Economy Strategy 2021-2022 Pre-consultation

The role of the circular economy in Ireland is now being mapped out by Government. The pre-consultation policy document⁶ notes that “Ireland is fully committed to transitioning to a circular economy and embracing the opportunities that this transition can bring. Those opportunities will include contributing to the restoration of our national habitats, supporting our achievement of climate neutrality, and delivering sustainable, regionally balanced economic growth and employment.”

The policy document highlights that “a transition away from fossil fuels towards renewables and supplemented by energy efficiency measures can only address 55% of emissions. The remaining 45% comes from making things. Therefore, making those things in ways that are more circular and less resource intensive has a key role to play in climate action. As such, ongoing alignment between policy in relation to climate action and the circular economy should be prioritised.” One model that can assist with expanding the circular economy is noted as the DISRUPT model as set out below.

D	Design For the Future: Adopt a systemic perspective during the design process, to employ the right materials for appropriate lifetime and extended future use.
I	Incorporate Digital Technology: Track and optimise resource use and strengthen connections between supply-chain actors through digital, online platforms and technologies.
S	Sustain & Preserve What's Already There: Maintain, repair and upgrade resources in use to maximise their lifetime and give them a second life through take-back strategies, where applicable.
R	Rethink the Business Model: Consider opportunities to create greater value and align incentives through business models that build on the interaction between products and services.
U	Use Waste as a Resource: Utilise waste streams as a source of secondary resources and recover waste for reuse and recycling.
P	Prioritise Regenerative Resources: Ensure renewable, reusable, non-toxic resources are utilised as materials and energy in an efficient way.

⁶ Whole of Government Circular Economy Strategy 2021-2022 Pre-consultation, The Department of the Environment, Climate & Communications, 2021

T Team Up to Create Joint Value: Work together throughout the supply chain, internally within organisations and with the public sector to increase transparency and create shared value.



An Roinn Talmhaíochta,
Bia agus Mara
Department of Agriculture,
Food and the Marine

Public Consultation on the environmental assessment of the Draft Agri-Food Strategy to 2030

Fields marked with * are mandatory.

Introduction

Background

Ireland's agri-food sector has benefited from an approach to strategic policy planning whereby sector-led strategies are developed every 5 years. The Minister for Agriculture, Food and the Marine convened a Committee representative of the sector to develop an agri-food strategy to 2030, with their terms of reference being to outline the vision and key objectives, with associated actions, required to ensure the economic, environmental and social sustainability of the agri-food sector in the decade ahead. To ensure that environmental considerations are fully integrated into the preparation of the Strategy, a Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) has been conducted in parallel with the work of the Committee.

The Department has procured RSK Ireland Limited to carry out a Strategic Environmental Assessment of the likely significant effects on the environment of implementing the 2030 Agri-Food Strategy.

The environmental assessment has been carried out in accordance with EU Directive 2001/42/EC and the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (SI 435 of 2004), as amended.

In addition, the consultants have been asked to undertake an associated Appropriate Assessment (AA) Natura Impact Statement pursuant to Article 6 of Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora as transposed into Irish law by S.I. 477/2011 the European Communities (Birds and Natural Habitats) Regulations 2011.

Terms and Conditions

The Department of Agriculture, Food and the Marine is collecting this data to inform the Environmental Assessment process as part of the development of the Agri-Food Strategy to 2030. All submissions, including the name of the person or organisation making the submission, will be shared with our external consultants who are conducting the Strategic Environmental Assessment and Appropriate Assessment on our behalf. All submissions, including the name of the person or organisation making the submission, will

be published on the Department's website, however, if you wish to make a submission but not be identified publicly this can be accommodated provided it is clearly indicated when the submission is made.

Freedom of Information

All submissions and comments submitted to the Department for this purpose are subject to release under the Freedom of Information (FOI) Act 2014 and the European Communities (Access to Information on the Environment) Regulations 2007- 2014. Submissions are also subject to Data Protection legislation. Personal, confidential or commercially sensitive information should not be included in your submission and it will be presumed that all information contained in your submission is releasable under the Freedom of Information Act 2014.

Data Protection

The Department of Agriculture, Food and the Marine is collecting this data to inform the Environmental Assessment process as part of the development of Agri-Food Strategy to 2030. All submissions, including the name of the person or organisation making the submission, will be shared with our external consultants who are conducting the Strategic Environmental Assessment and Appropriate Assessment on our behalf. This data will be processed in accordance with the EU General Data Protection Regulation (GDPR EU 2016 /679), the Data Protection Acts 1988-2018, the Freedom of Information Act 2014 and the DPER Consultation Principles and Guidance. Any additional personal data received as part of your submission will not be processed, shared, or retained and will be destroyed upon receipt. Further information on Data Protection can be found on our website <https://www.gov.ie/en/organisation-information/ef9f6-data-protection>

The Department of Agriculture, Food and the Marine is committed to protecting and respecting your privacy and employs appropriate technical and organisational measures to protect your information from unauthorised access. The Department will not process your personal data for any purpose other than that for which they were collected. Personal data may be exchanged with other Government Departments, local authorities, agencies under the aegis of the Department, or other public bodies, in certain circumstances where this is provided for by law. The Department will only retain your personal data for as long as it is necessary for the purposes for which they were collected and subsequently processed. When the business need to retain this information has expired, it will be examined with a view to destroying the personal data as soon as possible, and in line with Department policy.

Your Details

* Forename:

* Surname

* Country

* How would you best describe yourself?

- Farmer
- Fisher
- Forest Owner/Manager
- Engaged in employment in the food and drink industry
- Engaged in employment in other business/industry
- Representative of a farm/seafood/forestry organisation
- Representative of a civil society/NGO
- Representative of an employer organisation or trade union
- Advisor/Consultant
- Researcher/Academic
- Representative or working in a Public Body
- Member of the Public
- Other (please specify in box below)

Please specify here

* Please indicate if you are submitting your proposal on behalf of;

- an organisation
- as an individual

Name of Organisation

* Please choose from options below to indicate whether you wish to have your name published on the Departments website alongside your submission

- My name can be published
- I do not wish to have my name published

Questions

Q1. Do you have any observations on the conclusions in the Environmental Report and Natura Impact Assessment?

5000 character(s) maximum

While the report acknowledges the significant impact of agriculture on the environment, the mitigation measures it proposes are in no way strong enough to redress this damage. Too much emphasis is placed on technological solutions, most of them untested at scale, and the changes proposed are incremental. The loss of biodiversity in Ireland, the damage to water quality, the levels of ammonia pollution, the reduction in habitats and ecosystems - all of these issues demand serious action, but the measures proposed fall far short of what is required.

Q2. Having reviewed the Environmental Report, please provide comments on individual sections in more detail. Please ensure to state clearly the section of the Environmental Report and page number (if relevant) that your comment or submission relates to.

5000 character(s) maximum

Table 5.1 Assessment of Alternatives shows that Alternative 2, an environment-focused approach is clearly better in most areas. The 'middle ground' approach is presented as being better for Population and Human Health, but this is clearly a case where the result was chosen and the evidence picked to meet the desired result.

In both cases, the current (or minimally altered) farming model is presented as being necessary for employment. But this is a model that has seen farming-related employment drop continually for decades, and many farms are only marginally economic. A less intensive, more environmentally-focused model, could support more farm employment than the current system.

Even setting this aside, the assessment of alternatives shows that Alternative 2 does better on most measures. But this is not the alternative the report authors wanted, so even though it scores higher on the assessment criteria, it is not selected.

The current farming model is highly export-driven, with the result that Ireland has to import food that could be grown here, as well as feed to support the herd. If we shift our grants model so that farmers are paid for being stewards of the land, rather than maximising production, we can increase farming employment, population, human health, and ecosystem resilience.

Q3. Having reviewed the Natura Impact Assessment, please provide comments on individual sections in more detail. Please ensure to state clearly the section of the Natura Impact Assessment and page number (if relevant) that your comment or submission relates to.

5000 character(s) maximum

Q4. Is there any additional information which in your view should be considered in the Environmental Report and/or the Natura Impact Assessment? Please specify.

5000 character(s) maximum

Q5. Are there additional mitigation/monitoring measures that you would like to propose? Please specify.

5000 character(s) maximum

Q6. If you wish to make comments on the draft 2030 Agri-Food strategy, please ensure to state clearly the section of the draft Strategy and page number (if relevant) that your comment or submission relates to.

5000 character(s) maximum

Additional Supporting Information

If you have supporting documents, please upload here.

where possible, please limit supporting document to under 5000 words

Contact

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