



An Roinn Turasóireachta, Cultúir,
Ealaíon, Gaeltachta, Spóirt agus Meán
Department of Tourism, Culture,
Arts, Gaeltacht, Sport and Media

Our Ref: DP00021/2021

(Please quote in all related correspondence)

15/06/2021

Climate Change and Bioenergy Policy Division
Department of Agriculture, Food and the Marine
Pavilion A, Grattan Business Centre
Dublin Road
Portlaoise
Co. Laois

Via email: 2030StrategyEnvironmentalConsultation@agriculture.gov.ie

**Re: Draft Agri-Food Strategy to 2030 and associated Environmental Analysis,
incorporating an Appropriate Assessment and a Strategic Environmental
Assessment**

A chara,

I refer to correspondence received in connection with the above. Outlined below are nature conservation related observations/recommendations co-ordinated by the Development Applications Unit. These observations are offered to assist the Department of Agriculture, Food and the Marine in meeting its obligations in relation to nature conservation, European sites, biodiversity and environmental protection. The Department welcomes the opportunity to input to this process.

The Draft Strategy

The Draft Strategy recognises that there needs to be a profound shift towards more sustainable policies and action in responding to the climate and biodiversity crises. It considers that the future source of competitive advantage for the Irish agri-food sector lies in being able to demonstrate that it meets the highest standards of sustainability, such that it can be considered among the world leaders in this field.

The Draft Strategy proposes a 'Sustainable Food Systems' approach to address these requirements. It states that "A Sustainable Food System (SFS) is a food system that delivers food security and nutrition for all in such a way that the economic, social and environmental bases to generate food and nutrition for future generations are not compromised". The Draft Strategy then goes on to set out three underlying principles of a SFS:

1. It is profitable throughout (economic sustainability)

Aonad na nIarratas ar Fhorbairt

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2. It has broad based benefits for society (social sustainability)
3. It has a positive or neutral impact on the natural environment (environmental sustainability).

If the SFS objective is to be achieved, the Draft Strategy acknowledges that Ireland's agri-food sector will have to make significant changes. The Draft Strategy proposes that the sector should aim to become climate-neutral by 2050, with verifiable progress by 2030, in relation to emissions, biodiversity and water quality.

The Draft Strategy notes that previous agri-food strategies, particularly Food Wise 2025, have highlighted the importance of environmental sustainability. Food Wise 2025 includes eight overarching sustainability recommendations with over 80 individual environmental actions. Despite the implementation of a number of these environmental actions there has been an increase in greenhouse gas (GHG) emissions and in air pollutants such as ammonia over the Strategy period. In addition, water quality has declined and biodiversity continues to decline, with many European sites in unfavourable conservation condition. The EPA's State of the Environment Report 2020 highlights these negative trends in relation to emissions, biodiversity and water quality and the need for urgent action to address them.

The Draft Strategy sets out four missions to achieve its objectives. These are

- Mission 1: A Climate Smart, Environmentally Sustainable Agri-food Sector
- Mission 2: Viable and Resilient Primary Producers with Enhanced Well-being
- Mission 3: Food that is Safe, Nutritious and Appealing; Trusted and Valued at Home and Abroad
- Mission 4: An Innovative, Competitive and Resilient Agri-food Sector driven by Technology and Talent

Each of these missions has a series of goals. The most relevant mission in terms of the environment is Mission 1 (A Climate Smart, Environmentally Sustainable Agri-food Sector). Mission 1 outlines measures to address increasing emissions, biodiversity loss and declining water quality with goals as follows:

- Goal 1: Develop a Climate Neutral Food System so that by 2050, the Climate Impact of Methane is Reduced to Zero and remaining Agricultural Emissions are Balanced by Removals; and Improve Air Quality.
- Goal 2: Restore and Enhance Biodiversity.
- Goal 3: Protect High Status Sites and Contribute to Achieving Good Water Quality and Healthy Aquatic Ecosystems, as Set Out in the Water Framework Directive.



- Goal 4: Develop Diverse, Multi-Functional Forests.
- Goal 5: Enhance the Environmental Sustainability of the Seafood Sector.
- Goal 6: Embed the Agri-food Sector in the Circular, Regenerative Bioeconomy.
- Goal 7: Strengthen Origin Green and Other Sustainability Supports to Reflect the Higher Level of Ambition for the Agri-Food Sector.

The environmental commitments outlined in Mission 1 (and in its goals and actions) in the Draft Strategy are welcome. In particular the Goal 2 commitments to targeted agri-environmental schemes, including results-based schemes, to the development of a national land-use plan, to the roll out of farm-level biodiversity baseline studies to inform management, to measures to ensure that farming and forestry do not undermine biodiversity and to peatland restoration measures, are most welcome. In addition, Goal 1 commitments to implement AgClimatise and strengthen this approach further and to reductions in emissions of methane, ammonia and nitrous oxide are welcome; as are Goal 3 commitments in relation to water quality.

The Department notes that much of the detail in relation to delivery of the outcomes set out in the Draft Strategy are set out elsewhere, (for example in the AgClimatise document published in December 2020), or are to be set out in the future (for example, in response to the requirements of the Climate Action and Low Carbon Development Bill).

The Department welcomes the clear identification in the Draft Strategy of the challenging environmental context within which agriculture and the food sector operates with particular reference to the current climate and biodiversity crises; and the inclusion in the Draft Strategy of measures to address these issues on an urgent basis.

The Department is of the view that the Agri-Food Strategy needs to more clearly address the need to provide for biodiversity protection and restoration and to avoid any further biodiversity losses. Given the scale of the challenge involved, the Department is of the view that commitments to protect and restore biodiversity must be more specific and strengthened, with a clear commitment to meet the requirements of the Nature Directives, national legislation, the National Biodiversity Action Plan and the Prioritised Action Framework for Ireland in this regard.

There should be clear and measurable actions in the Strategy to ensure that the agri-food sector contributes to the following goals:

- i) protection and restoration of nature conservation sites, including European sites and nationally designated sites (e.g. NHAs),
- ii) maintenance or restoration of the favourable conservation status of natural habitats and species,



- iii) conservation of legally protected species and species of conservation concern, and
- iv) conservation and restoration of biodiversity in the wider countryside.

In short, while the measures included in the Draft Strategy are welcome it is not clear that they provide a sufficient basis to urgently halt and reverse current trends in relation to emissions, biodiversity decline and water quality to which the agri-food sector is a major contributor.

Because the effective implementation of the Agri-Food Strategy will require early and strategic consideration of the ecological and environmental implications of individual plans, programmes and projects which flow from it, the Department is of the view that the Strategy should set out a firm framework to ensure that environmental assessment of associated plans and projects happens at the earliest opportunity. In addition the Agri-Food Strategy should set out mechanisms to assist the assessment of cumulative or in-combination impacts that could arise.

Finally the implementation and review mechanisms proposed in the Draft Strategy need to be clarified and strengthened to ensure that progress is made in a timely fashion to address urgent environmental challenges. In this regard the identification of key targets would be most useful and the Strategy should also set out clearly what will happen if such targets are not met.

Natura Impact Statement and Appropriate Assessment

The Department notes that a Natura Impact Statement (NIS) has been prepared by consultants ADAS on behalf of the Department of Agriculture, Food and the Marine. The NIS sets out at a high level the impacts of agriculture on biodiversity and the potential pathways for impact arising from the Draft Strategy. It does not however identify which European sites are subject to likely significant effects from the Draft Strategy nor does it set out how the measures proposed will operate to ensure that European sites are protected. The Department is of the view that while measures included in the Draft Strategy to address impacts to biodiversity are most welcome it is entirely unclear what the impacts of such measures will be on European sites. In particular it is not clear that the measures proposed are sufficiently specific and targeted to ensure that negative impacts to European sites are avoided. It is therefore the Department's view that it is not possible to conclude with any certainty that the Draft Strategy will not adversely affect the integrity of a European site or sites.

SEA Environmental Report

The Department notes the Environmental Report that has been prepared as part of the process to prepare the Draft Strategy and acknowledges the integration of environmental issues and concerns into the preparation of the Draft Strategy as a result of this process. The Department notes the examination of Alternatives that has been undertaken and the decision



made to choose the alternative which provides for a "Balanced Approach" to sustainability in the preparation of the Draft Strategy. While the Department welcomes the clear recognition of the environmental challenges for the sector, and welcomes the many measures included in the Draft Strategy to address these issues, it is not clear that the measures included in the Draft Strategy are sufficient to ensure that the sector becomes climate-neutral by 2050, and that there will be sufficient and verifiable progress by 2030 in addressing the key issues of emissions, biodiversity and water quality.

Final Comments

The Department would welcome an opportunity to meet with the Department of Agriculture, Food and the Marine in relation to the development of the Draft Strategy and the environmental assessment processes which are currently being undertaken.

You are requested to send any further communications to the Development Applications Unit (DAU) at [REDACTED] or to the following address:

[REDACTED]
[REDACTED]

Is mise, le meas

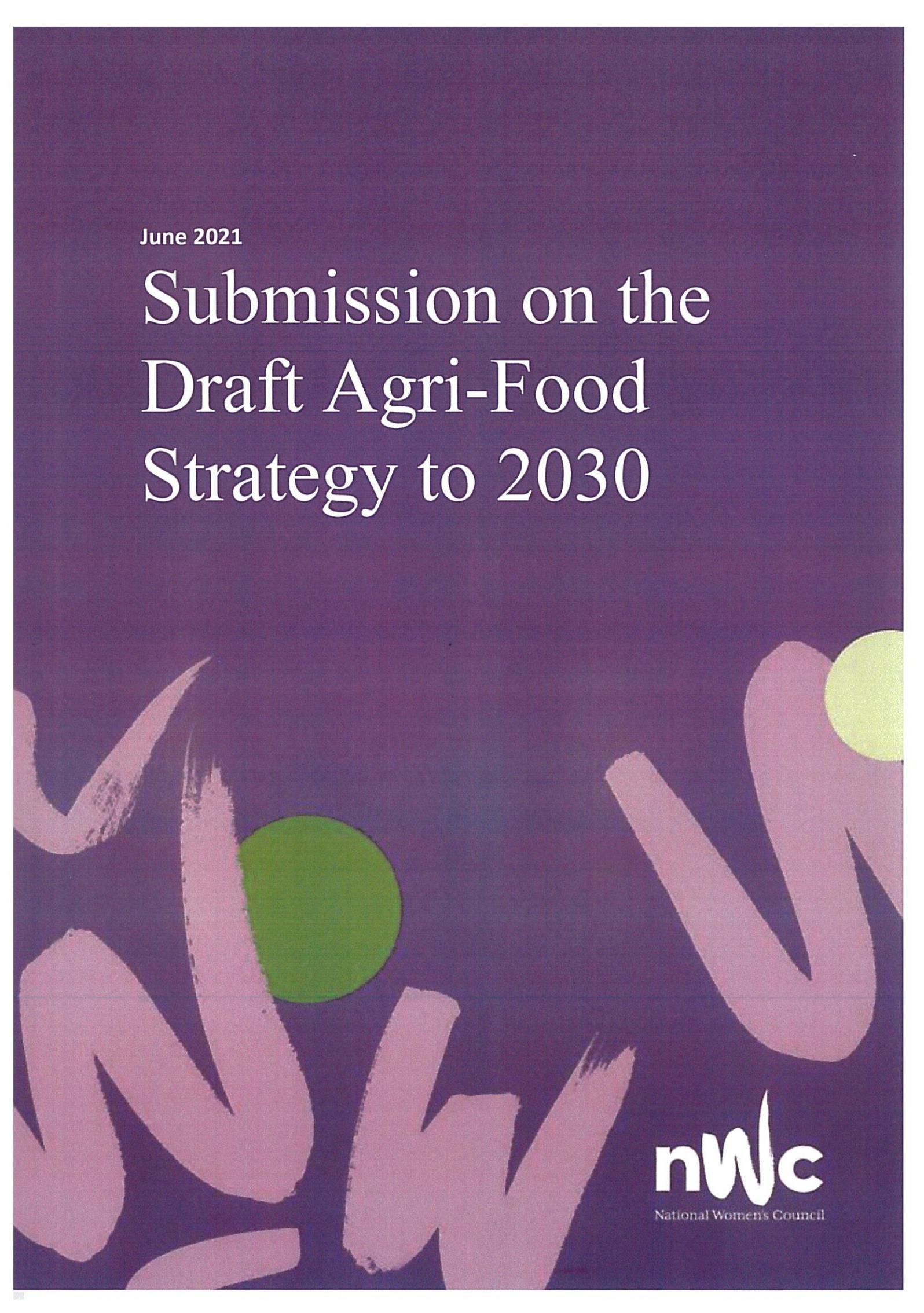
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Development Applications Unit

June 2021

Submission on the Draft Agri-Food Strategy to 2030



nWc

National Women's Council

Introduction

Founded in 1973, the National Women's Council (NWC) is the leading national women's membership organisation. We represent and derive our mandate from our membership, which includes over 190 groups and organisations from a diversity of backgrounds, sectors and locations across Ireland. Our mission is to lead and to be a catalyst for change in the achievement of equality for women. Our vision is of an Ireland and of a world where women can achieve their full potential and there is full equality for women.

Women want to continue to be part of rural Ireland and be valued for their contribution to the economic and social fabric of rural communities. Our work has identified an undervaluing of the contribution of women to rural communities and a lack of access to power and resources. Resourcing and supporting the engagement and participation of women in all their diversity, is essential to the sustainability and viability of rural communities. Agriculture is an important part of rural life and women on Irish farms make a substantial contribution. Positive action and specific targeted measures are required to address the persistent gender gap in land ownership and ensure that young women can benefit from the investment and strategies developed to tackle generational renewal and deliver on our climate justice obligations.

We welcome the opportunity to make this submission to the Agri-Food Strategy 2030 following engagement with our members and stakeholders in rural communities. Our recommendations reflect existing obligations under the National Strategy for Women and Girls (NSWG) and United Nations Convention Elimination of all forms of Discrimination against Women. In the Concluding Observations that arose as a consequence of Ireland's examination under the Convention in early 2017, they recommended the following;

*"The Committee recommends the State Party to ensure the integration of a gender perspective in the new Action Plan for Rural Ireland currently being developed and to provide information in its next periodic report on the overall situation of rural women highlighting the impact of the measures taken to **improve on rural women's land ownership and participation in agriculture** as well as access to social services including public transport childcare, health services, employment, education and training."*

We welcome that the role of women has been highlighted in the draft plan calling for an enhanced role for women in the sector through the development of networks for women.

“The Strategy supports an enhanced role for women in the sector and recommends the establishment of female farmers’ networks and other supports to better understand and meet the needs of Irish women farmers, fishers and rural female entrepreneurs.”

The National Women’s Council welcomes the Minister for Agriculture Charlie McConalogue’s commitment to improve gender equality on farms but believe that concrete measures are needed at Government level and under Pillar II funding in the next CAP to ensure that Ireland tackles the gender gap on farms.

This work is kindly supported by the Department of Rural and Community Development through the Scheme to Support National Organisations (SSNO) administered through Pobal.

Women and Land Ownership

Ireland has the fifth lowest number of female farmers in Europe and despite successive women and agriculture campaigns over the last decade only one farm organisation has a concrete Common Agriculture Policy (CAP) to encourage more women to enter into farming.¹ Women’s contribution to farming can go largely unnoticed and unrecognised in statistics and policies despite the fact that over a quarter of those working on farms (71,700) are women.² The Central Statistical Office (CSO) figures from 2018 reported that the women farmers make up just 12% (16,100) of the 137,100 family farms in the country. Just 3.8% of farms are registered with the Department of Agriculture in joint female/male names. There has been no increase in women’s ownership of land since 2010. By way of contrast, in Austria, 33% of women are farm owners. In Norway, to increase access to land for women; they introduced a law in 1974 where the eldest child is the legal heir. Inheritance is usually not based on ability or interest but on gender. A 2017 study undertaken by Macra supported by the Irish Farming Association (IFA) on Land Mobility and Succession, shows that this imbalance is unlikely to change in the short to medium term, as only 11% of those identified in the report as potential successors, are women.³ Teagasc has acknowledged that young women account for just 10% of their students. In another study, 57% of all men responded to say gender did not influence succession plans, however only 35% of all women respondents agreed with this. 63% of women said gender does influence succession plans.⁴ The patriarchal and traditional succession system of passing farms from father to son has been a huge barrier for women’s

¹ <https://www.farmersjournal.ie/women-overlooked-in-next-cap-624482>

² Anne Byrne, Nata Duvvury, Áine Macken-Walsh, Tanya Watson (2013) Gender, Power and Property: In my own right. The Rural Economy Development Programme (REDP) Working Paper Series. Working Paper

³ IFA Submission to the National Strategy on Women and Girls 2017 - 2020

⁴ https://ec.europa.eu/info/food-farming-fisheries/key-policies/common-agricultural-policy/cmef/farmers-and-farming/pilot-project-exchange-programmes-young-farmers_en

access to land, as recognised in the work of Dr Sally Shortall.⁵ Irish farms are still transferred to sons and most women enter farming through marriage.

In 2014, Tanya Watson, NUI Galway reported in her study, that state subsidised training and knowledge transfer is mainly directed at the land owner, which despite the reality of farm living being a household process, typically remains male. Women were slightly older than their male counterparts, with an average age of 62 compared to 56 for men. 31% of female farmers are over 80 years of age.⁶ The age of women farmers suggested many come to inherit farms when they become widowed and affirms that they are not actively considered for succession. The Rural Development Programme recognised that men account for more than 90 per cent of farm holders and this could be '*detrimental in terms of the human capital capacity of the sector and may also inhibit technology uptake and structural change.*'⁷

Common Agricultural Policy Reform

The farm owner who receives the Common Agriculture Policy (CAP) payment is the public face, just eight percent of the €1.2 billion of Ireland's EU CAP Single Farm Payments went to women farmers in 2012.⁸ Only 10% of the land in women's ownership is eligible for basic payments. Analysis reveals further inequalities in payment amounts; on the top and bottom 60 CAP payments across 5 counties in the North/West Irish women farmers make up on average 3% of the top payments while making up on average 20% of the lowest payments.⁹ **There are very few areas of public expenditure, where 90% of public investment is going to one gender.** Data from a publication on direct payments, broken down by age and gender from the Ministry for Agriculture in Spain show that 36% of Spanish farmers were women and that they received 27% of total Single Farm Payments.¹⁰ The gender of CAP recipients across the EU should be recorded. Such data would allow for more meaningful inter-regional comparisons and allow progress to be tracked over time.

Farms in receipt of Basic Payment Scheme payments by Gender, 2015¹¹

⁵ <https://www.rte.ie/brainstorm/2021/0308/1201578-ireland-women-farmers/>

⁶ <https://www.agriculture.gov.ie/media/migration/publications/2017/AnnualReviewandOutlookFinal270717.pdf>

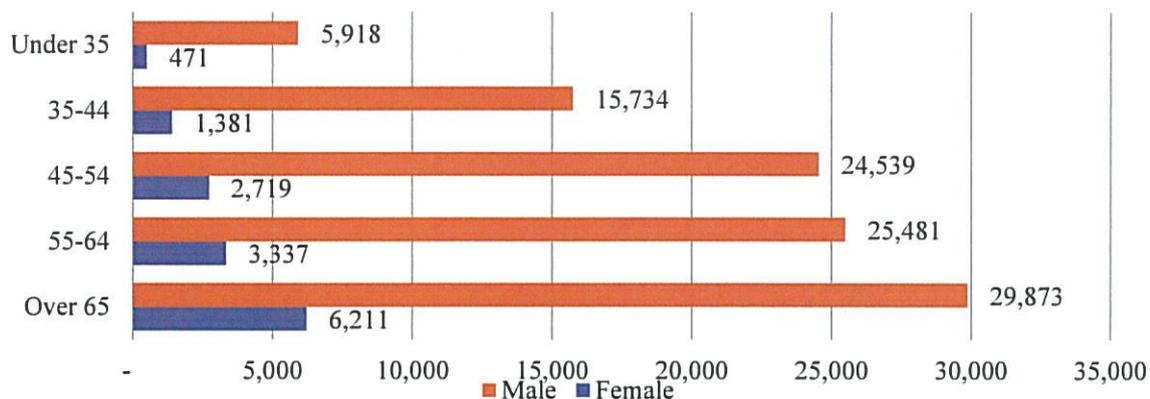
⁷ Department of Agriculture, Food and the Marine (2014). Ireland's Rural Development Programme 2014–2020 (2014), p. 29.

⁸ Anne Byrne, Nata Duvvury, Áine Macken-Walsh, Tanya Watson (2013) Gender, Power and Property: In my own right. The Rural Economy Development Programme (REDP) Working Paper Series. Working Paper

⁹ Research courtesy of Bridget Murphy

¹⁰ <https://www.agriculture.gov.ie/media/migration/publications/2015/AROFinalVersion2015Amended210915.pdf>

¹¹ Department of Agriculture, Food and the Marine.



It is estimated that there 3,000 joint herd numbers. Women generally experience difficulties accessing a herd number and cannot qualify for other schemes, subsidies and supports without a herd number. Information from the Young Farmer Scheme shows that in 2018 only 819 out of 4213 participants were women.¹²

The contribution of women in the farming household is often hidden, taking place in the private realm-completing accounts and administration work for example¹³. Their professional roles and contributions are often downplayed and 'undercounted' thereby reinforcing the identity of the farmer and decision maker as male.¹⁴ The CAP 2023 offers an opportunity to review the role of women in agriculture and their contribution to farm viability. Generation renewal is one of the main objectives for CAP reform programme. CSO figures published in 2018 showed that over half of Irish farmers are over 55 years of age, with 30 per cent of farmers over the retirement age. From 2013 to 2018, the number of farmers under 35 fell from 8,200 to 7,100. The agri-taxation working group identified barriers to greater participation of women in agriculture.¹⁵ Supporting women in agriculture in the context of generational renewal is also identified in Our Rural Future: Rural Development Policy 2021-2025 "*The farming sector cannot reach its full potential without the active engagement of women and proactive efforts*

¹² September 2019 Response to parliamentary question

¹³ The role of women in completing the domestic and caring labour necessary for the farming household is not counted at all of course

¹⁴ Shortall, S. (2017) Changing Gender Roles in Irish Farm Households: Continuity and Change Irish Geography, 50(2), 175–191, DOI: 10.2014/igj.v50i1.1321

¹⁵ <https://www.agriculture.gov.ie/agri-foodindustry/agri-foodandtheeconomy/agri-foodbusiness/agri-taxation/>

to facilitate their participation.”¹⁶ Incentives and specific measures for girls and young women must be prioritised including seats at the decision-making tables.

*“The family nature of most farming businesses in Ireland is recognised but not adequately supported in terms of ensuring the visibility and voice of women on farms. Many aspects of farm productivity and profitability as well as health and safety could be more effectively supported through engagement of advisory and support services with farm women”.*¹⁷

Gender and Equality Budgeting

The NSWG contains a commitment to develop a process of budget and policy proofing as a means of advancing equality, reducing poverty and strengthening social and economic rights as well as ensuring the institutional arrangements are in place in government departments to support this work. The Department of Agriculture was not one of the departments that participated in the Gender and Equality Budgeting pilot project. However, given the Department's role in recognising the value of diversity and gender equality¹⁸, it is particularly important that its resources are allocated in a way that promotes gender equality. While there is currently no statutory obligation on government departments to carry out gender and equality proofing, the OECD have included this in its recommendations to Ireland.¹⁹ In light of the highly gendered nature of public investment in this aspect of the Irish economy, the Dept of Agriculture should as a matter of urgency review the expenditure of public monies under their control and ensure they are supporting the development of more equal and diverse agricultural sector. All government departments do have an obligation to promote equality and protect human rights under the Public Sector Duty.²⁰

Recommendations

Land mobility, generation renewal and succession

- NWC supports the proposed policy of the Irish Cattle and Sheep Association (ICSA) that a top-up payment should be provided to Knowledge Transfer groups under the next CAP who have at least three women participants. This top-up payment should be in the region of 15% per participant.
- Given the low number of joint female/male farm holders, only 3.8%, NWC is proposing that all joint farm partnerships where a woman is a named partner should receive a 60%

¹⁶ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/132413/433aebac-f12a-4640-8cac-9faf52e5ea1f.pdf#page=81>

¹⁷ UCD School of Agriculture and Food Science Submission on Review of the Common Agricultural Policy (CAP) Post-2020

¹⁸ DAFM Statement of Strategy 2021 – 2024

¹⁹ <https://www.oecd.org/gov/budgeting/equality-budgeting-in-ireland.pdf>

²⁰ <https://www.ihrec.ie/our-work/public-sector-duty/>

Targeted Agriculture Modernisation Schemes (TAMS) grant, in the next evolution of TAMS in CAP. This is similar to the current young farmers scheme which provides a 60% TAMS grant to eligible young farmers.

- Over two-thirds of women farmers are over 55 and NWC is concerned that young women farmers have been repeatedly overlooked by farm organisations and the Department of Agriculture. Currently young farmers receive a 25% top-up on their annual farm payment and given the low number of young female farmers, NWC is seeking a 35% top-up for young women farmers under 40 years of age in the next CAP.
- Collect and publish gender disaggregated data on take up of all schemes and measures
- New women entrants over 40 to get a 25% top up on their single farm payment.
- Pillar II pilot scheme that would directly address women in agriculture focusing on land mobility and installation aid for young women farmers.
- The identification in the CAP strategic plan of women farmers as a specified group and the need for their improvement under the next CAP period. This should include a Department of Agriculture target to reach a 25% sole or joint female farm ownership level within the next CAP strategic plan.

Womens representation in Agri business and Co-operatives

Traditional perceptions of women's position in farming organisations still hold. Currently 7 out of 29 chairpersons of Irish Farming Association (IFA) branches are women.²¹ Five chairs of the forty-one committees are women and there is only one woman on the National Council. They have launched their diversity strategy towards 2025.²² We have seen the emergence of women farmers networks such as the West Women in Farming Network and South East Women in Farming Network on a provincial basis, however they do not have seats at the decision-making tables nor are they resourced to participate. CERES (The Women in Agribusiness Leadership Network) have consistently highlighted the lack of women's representation on boards. Lakeland Dairies, an Irish Dairy Co-operative, continues to have an all-male board.²³

Recommendations

Promoting women's participation and leadership in agriculture

- Given the current poor representation of women in the agriculture sector, NWC is calling for gender balance and gender expertise on the board of all future stakeholder groups, such as the Agri-Food Strategy, to ensure that gender goals outlined nationally within Government and the recent Citizen's Assembly are addressed and given representation at a national level in the agriculture sector.
- Promote and report on women in leadership roles in the agri-food sector, including improving gender balance in stakeholder organisations and State and company boards in the sector.
- NWC supports the draft Agri-Food Strategy recommendation to establish women farmers' networks and the need to hold a national dialogue on women in agriculture. Both will require adequate funding and resourcing from the Department of Agriculture to ensure their success and effectiveness.

²¹ <https://www.ifa.ie/county-chairs/>

²² <https://www.ifa.ie/wp-content/uploads/2019/10/IFA-Diversity-Report-A4-Sep19-FINALWeb.pdf>

²³ <https://www.lakeland.ie/about-us/our-board>

- Promote women's participation in farming through Knowledge Transfer (KT) Groups facilitated by a female advisor. This is in keeping with the spirit of the KT Programme where like-minded farmers who experience similar challenges and opportunities form groups.
- Hold a National Dialogue on Women in Agriculture and commission a report into women in agriculture similar to the study carried out by the Scottish government in 2016
- Promote and support women's networks, such as CERES (The Women in Agribusiness Leadership Network), and mentoring programmes for rural women entrepreneurs such as ACORNS.
- Promote and support women's return to work programmes, such as that developed by UCC and Taste4Success Skillnet 'Rejuvenate'. These are important for increasing women's participation in the agri-food labour force.

Appendix

CSO Farm Structure Survey

137,100 farms were classified as family farms in 2016 CSO figures.

- Over 88% (121,000) of family farm holders were male while 12% (16,100) were female farm holders – the number of female farm holders was the same in the 2013 CSO figures.²⁴
- Over a quarter (71,700) of those working on farms were female. However, less than one quarter (16,100) were holders of the farms on which they worked.²⁵
- Just 5% of farm holders were aged under 35 but for every one female farmer aged less than 35 years, there were 11 male farmers.²⁶
- A Macra Na Feirme study pointed out that farmers identified female successors in just 11% of cases.²⁷
- According to Department of Agriculture's client database women account for 13% of farms; 10% of eligible land; and 8% of payments – the difference in female ownership of land and the drop-in number receiving payments suggests women have inherited land from their deceased husbands and are renting it out rather than farming it themselves.
- Just 3.8% of farms are registered in joint female/male names (DAFM).
- Across the EU, 29% of farms are managed by women. Latvia and Lithuania have the highest with 45% female managers respectively, while Ireland is in the bottom five countries with just 11% of farms managed by women.²⁸

²⁴ <https://www.cso.ie/en/releasesandpublications/ep/p-fss/farmstructuresurvey2016/da/fo/i/>

²⁵ <https://www.cso.ie/en/releasesandpublications/ep/p-fss/farmstructuresurvey2016/da/fo/i/>

²⁶ <https://www.irishexaminer.com/farming/arid-20270984.html>

²⁷ <https://www.irishexaminer.com/farming/arid-20270984.html>

²⁸ <https://www.euractiv.com/section/agriculture-food/news/women-farmers-essential-for-future-says-french-agriculture-minister/>

Submission by [REDACTED] on behalf of FoodCloud.

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

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Food waste accounts for 8-10% Global GHG emissions, 4 times global aviation. Whilst it was previously estimated that 1 M tonnes of food was wasted in Ireland every year, recent UNEP reports now suggest that this figure is gravely underestimated.

Under the assessment of impacts of the AgriFood Strategy to 2030 Goal 1 (this is under Goal 6 in the Agri-Food Strategy 2030, pg. 52), Action 8, the reduction of food waste across the food and beverage sector it states that there is limited impact of this action across the SEA objectives. We strongly believe the impact of reducing food waste and adopting zero waste approaches is underestimated in this report. (pg. 54).

In addition Mission 1, Goal 6, Action 2 Scale up resource-efficient, circular and low carbon solutions based on principles of renewable energy, cascading and circular use of sustainable biological resource (pg. 61) does not align with the Food Waste Hierarchy that is best practice for reducing food waste and also is referenced in the governments Circular Economy Action Plan (Nov 2020).

This goal is stated as having a neutral effect across the SEA objectives which also does not align with international reports. The goals referencing the reduction of, or the circular economy approach to, food waste should align with the food waste hierarchy and the UNEP report, Project Drawdown and the EU Farm to Fork strategy. *The hierarchy recommends feeding people with this food as a circular economy solution over bioenergy, animal feed, or compost.*

Based on the recent UNEP report it shows that:

- If food loss and waste were a country, it would be the third biggest source of greenhouse gas emissions. Food waste also burdens waste management systems, exacerbates food insecurity, making it a major contributor to the three planetary crises of climate change, nature and biodiversity loss, and pollution and waste. This is why Sustainable Development Goal 12.3 aims to halve food waste and reduce food loss by 2030.
- According to the UNEP Food Waste Index Report 2021, food waste reduction offers multi-faceted wins for people and planet, improving food security, addressing climate change, saving money and reducing pressures on land, water, biodiversity and waste management systems. The report goes on to say that this potential has until now been woefully under-exploited because the true scale of food waste and its impacts have not been well understood and that few governments have robust data on food waste to make the case to act and prioritize their efforts (UNEP, 2021).

UNEP 2021 - UNEP Food Waste Index Report 2021 | UNEP - UN Environment Programme

Project Drawdown, the global research project looking at the top 100 solutions to reversing global warming, also highlights food waste reduction as the no. 1 solution to tackling food waste if we aim to keep global warming below 1.5 degrees celsius. It states that:

IMPACT: After taking into account the annual adoption of plant-rich diets, if 50-75 percent of food waste is reduced by 2050, avoided emissions could be equal to 10.3-18.8 gigatons of carbon dioxide. Reducing waste also avoids the deforestation for additional farmland, preventing 74.9-76.3 gigatons of additional emissions. We used forecasts of regional waste estimated from farm to household. This data shows that up to 35 percent of food in high-income economies is thrown out by consumers; in low-income economies, however, relatively little is wasted at the household level.

<https://drawdown.org/solutions/reduced-food-waste>

Under the assessment of impacts Goal 1, Action 7, there is no reference to food redistribution as a circular economy solution for food waste and there is reference only to bio-energy. This is also highlighted as a risk in the report (pg. 127) as this strategy may present adverse effects. It is imperative that redistribution is included as a circular economy solution to food waste as is referenced in the EU Farm to Fork Strategy under food waste reduction 'Tackling food loss and waste is key to achieving sustainability. Reducing food waste brings savings for consumers and operators, and the recovery and redistribution of surplus food that would otherwise be wasted has an important social dimension.' (2.5 pg. 15)

Tackling food waste has also been called out by former Minister Richard Bruton's recent draft report of circular economy (May 2021) as having potential for major climate dividends.

<https://www.irishtimes.com/news/environment/tackling-food-waste-in-ireland-has-potential-for-climate-dividend-1.4575087>

https://ec.europa.eu/food/system/files/2020-05/f2f_action-plan_2020_strategy-info_en.pdf

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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



FoodCloud

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'Material Assets: Beneficial effects are predicted on the material assets objective from a number of actions in Mission 1, primarily from Goal 6, which focuses on the circular bioeconomy and improvement and better use of waste materials. This would support the re-use of materials. The detailed assessment also identified the potential for moderate beneficial effects from Goal 1, where the action to scale up renewable energy sources is likely to help conserve finite fossil fuels and make use of bioenergy, helping to reduce waste generation (pg. 122).' This should include a reference to food redistribution as a solution to reducing food waste as well as re-use and making use of bio-energy.

'Goal 6 is concerned with embedding the agri-food sector in a circular economy through scaling up and adopting circular principles to make production systems regenerative. This goal is highly focused on the improvement and better use of waste materials from fisheries, farms and timber production, therefore it is expected to generate benefits in material assets across all actions that support this goal. Likely but somewhat uncertain positive effects are also expected for the climate change objective through the scaling up of energy efficient and low carbon renewable energy sources and a circular bioeconomy (pg. 89).' This should include food redistribution as a solution - a lot of food waste that arises along the supply chain is surplus food and is fit for human consumption. In line with the food waste hierarchy, we should prioritise feeding people with this food as a circular economy solution over bioenergy, animal feed, or compost.

0 / 5000

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.

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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

No answer

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

Under Goal 6: Embed the agri-food sector in the circular, regenerative bioeconomy, the report references the need to publish preliminary data on food loss at primary production stage (Action 7) and develop indicators to monitor the trend in this aspect over the Strategy implementation period. This is positive but more work is needed across the food supply chain to improve data and reporting on food loss and waste. The current national data referenced in the report and provided by the EPA



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does not align with international data from the UK, EU and in the UNEP report 2021 and therefore is likely not accurate.

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- The UNEP Food Waste Index Report 2021 estimates that around 931 million tonnes of food waste was generated in 2019, 61 per cent of which came from households, 26 per cent from food service and 13 per cent from retail. This suggests that 17 per cent of total global food production may be wasted (11 per cent in households, 5 per cent in food service and 2 per cent in retail)
- Sustainable Development Goal 12.3 (SDG 12.3) captures a commitment to halve food waste at the retail and consumer level and to reduce food loss across supply chains. Ireland has committed to the achievement of the UN SDGs.
- The UNEP Food Waste Index Report identifies 17 countries with high-quality data compatible with SDG 12.3.1(b) reporting in at least one sector: Australia, Austria, Canada, China, Denmark, Estonia, Germany, Ghana, Italy, Malta, the Netherlands, New Zealand, Norway, the Kingdom of Saudi Arabia, Sweden, the United Kingdom and the United States. Ireland is one of forty two countries whose data is assigned a "medium confidence" level in the UNEP report. Whilst the aims for food waste reduction in the draft strategy are welcome, we currently do not have a solid baseline of data to work from. Ireland needs to urgently prioritise data gathering for food waste across the supply chain if it is to achieve the aims of the draft agri food waste strategy.

In the EU Farm to Fork Strategy under Reducing Food Waste (pg. 15) it states 'Using the new methodology for measuring food waste (Commission Delegated Decision (EU) 2019/1597 of 3 May 2019 supplementing Directive 2008/98/EC of the European Parliament and of the Council as regards a common methodology and minimum quality requirements for the uniform measurement of levels of food waste (OJ L 248, 27.9.2019, p. 77) and the data expected from Member States in 2022, it will set a baseline and propose legally binding targets to reduce food waste across the EU.

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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.

The high-level commitments to reducing food waste are a positive step in the right direction e.g.:

- Ireland should set an ambition to be a leader in tackling food waste and meet the UN SDG target of halving per capita food waste by 2030.
- Develop a National Food Waste Prevention Roadmap that sets out a series of actions to deliver the reductions necessary to halve our per capita food waste by 2030
- Research the extent of food loss at the production (primary) stage in an Irish context, and develop innovative ways of reducing it.



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Whilst these commitments are welcome the associated actions do not reference redistribution as one of the solutions to reducing food waste. Redistribution is particularly important so that we; effectively follow the food waste hierarchy, anticipate and prepare for shocks in supply chains due to unforeseen events (e.g. Covid) and also the positive social impact created by redistribution (see EU Farm to Fork strategy, UNEP Report, the SEA Objectives Population). Actions 5, 6 and 7 (Mission 1, Goal 6) refer directly to tackling food waste and reference the Government's Waste Action Plan and yet there is no specific reference to the food waste hierarchy and the need to prioritise feeding people and animals above Anaerobic Digestion. Further information on the benefits and opportunities are included in the attached PDF and also in the previous answers.

The only reference to redistribution in the full Agri-Food Strategy is in the case study (Meade Farm Group) on pg. 73 where there is a reference to gleaning. This results in less than 0.05% of FoodCloud's total surplus food recovered annually and whilst it is an important way to rescue food that can be scaled, it is not the primary method of redistributing food which last year resulted in 3,022 tonnes of food being reduced across Ireland (7.5m meals equivalent).

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Public Consultation on the Environmental Assessment of the Draft Agri-Food Strategy to 2030

Written & Edited by [REDACTED] & [REDACTED]

The Green Step Community is a not-for-profit group of people who have come together for their love of life on earth. Together we have been inquiring into the 21st century realities of farming, land use and food production in Ireland. Over the course of 10 podcasts and 1 live community event we have been listening and learning from one another to facilitate deeper understanding. In this *Tales from the Land* inquiry, we have heard from over 33 people their struggles and potential solutions relating to our Irish food system. These people have come from a range of different backgrounds including environmental educators, climate activists, researchers, traditional farmers, food growers and producers, ecologists, teachers, artists, business owners, a representative from the Irish Cattle Breeding Association and the Pearle Mussel Project for Results Based Agricultural Payment Schemes.

Overview

We at the Green Step find the Draft Agri- Food Strategy to 2030 to be ambitious in its goal for Ireland to “become a world leader in Sustainable Food Systems (SFS) over the next decade”. This is a goal we broadly support as we also support the 4 high-level targets. Yet we have some serious concerns about how these goals are to be implemented. There are several prescient problems that have either been overlooked completely or only briefly been addressed.

This strategy is an industry-led, export driven plan to increase production and output. We feel that this plan was created to increase the market for large farmers, processors and supermarkets. Smaller producers are overlooked for most strategy. The plan is deeply embedded in the current infinite growth economic model. This approach is understandable since the free-market capitalist neoliberal system has dominated western thinking for the past 50+ years, however going forward we strongly feel that a doughnut economic model, based on the work of Kate Raworth¹, and circular economy approach needs be implemented going forward. Should the mindset of infinite growth on a finite planet continue no matter what the strategy says small producers will be pushed out the market and environmental degradation will continue at pace.

Based on our community consultation we recommend that small producers and the environment be at the center of the new strategy and that the power of large processors and supermarkets reduced drastically. Localization of food production and an internalization of our market need to be at the heart of this transition with export and externalization coming second.² We ask "*Why do we expect other societies and nations to pay for the cost of our environmentally friendly agriculture?*" When we expect the 'other' (i.e. consumer/nation/business/community) to pay for the true cost of our food, either in the market or with subsidies, this furthers the inequalities in our globalized food systems and is not sustainable.

We need to focus on food sovereignty³ to be resilient to the challenges posed by the climate and biodiversity crises and lessen global inequality. Here it is important to know that to work for food sovereignty in Ireland means advocating for food sovereignty internationally. In Ireland Talamh Beo is a key network working for and educating people on the importance of food sovereignty.⁴ Furthermore we need to be striving beyond a sustainable food system to a regenerative food system. The true cost of food in the Irish market needs to be recognized with relevant outdoor, farm-based education campaigns (e.g. promoting the work of 'Farming for Nature') to highlight this while also promoting the GIY Grow It Yourself Movement.⁵

Of course, changes of this kind mean a revolution in our thinking of our food systems which can be very hard to address when people have vested interests in the current system. For this process of negotiation, we recommend working with independent facilitations of Non-Violent Communication⁶ and Restorative Practise⁷ to navigate challenging, transformative conversations and find solutions that best meet the needs of all stakeholders. These are the approaches we used during our Tales from the Land inquiry to great success.

The document below is broken into 2 parts.

Part 1: Key actions from the draft strategy that need to be reviewed and changed.

Part 2: The issues that arose during our conversations with stakeholders in the Irish agricultural system which are not mentioned in the draft strategy.

Part 1

Mission: A Climate Smart, Environmentally Sustainable Agri-Food Sector

We support the key targets of this mission. They are ambitious and the large-scale change we need to see as we face the dual crisis of Biodiversity Loss and Climate Change yet more is needed. Creating a Climate neutral sector by 2050 would be a significant achievement, but we question how this will be possible using the actions listed?

Goal 1 Action 2. "AgClimatise makes clear that an increase in the national cattle herd above current levels will jeopardize the achievement of the sector attaining climate neutrality by 2050"

The AgClimatise plan makes it clear that the national cattle herd is a key driver of greenhouse gas (GHG) emission in Ireland. It is the largest single emitter of greenhouse gases in the state. Yet there is no mention of having a limit on the number of cattle in the national herd? A cap is needed as currently the only limit on production is the amount of land. This has led to destruction of vast swathes of hedgerows scrubland and the accompanying biodiversity.

We acknowledge the important role played by genetic selection and the Irish Cattle Breeding Association to reduce the environmental impact of individual animals and herd emissions.⁸ However, this cannot be the primary solution to the GHG emission of the nation cattle herd, and it must be done in tandem with farm diversification and reducing herd size. All the farmers we spoke to lament the days were a smaller heard size and less manual labor was able to bring in a decent income.⁹ Now farmers are being pushed to be bigger and produce more for less return which increases economic stress and mental wellbeing within our farming community. Limiting and reducing our herd size while increasing farm diversification is essential to achieving our international and domestic obligations and this should be included in the plan.

Goal 1. Action 6. *Research and promote the concept of 'Regenerative Agriculture'*

This is vitally important and should be at the center of a new way in Irish agriculture yet it is only given 2 lines in the strategy. There is not a single measurable goal associated with this action. There is an important distiction between Sustainable and Regenerative. Sustainable is defined by the Cambridge dictionary as able to continue over

a period of time and causing little or no damage to the environment and therefore able to continue for a long time. Rather than cause little or no damage to the environment we need to be actively working to restore health to the ecosystems and soils across the country and this is where Regenerative Agriculture comes in. Regenerative means to improve and grow or be grown again. The language used in this report will drive the future change and it is key that the use of 'Regenerative Food systems' is prioritised over 'Sustainable Food Systems'

Goal 2. Action 1. *Carry out baseline biodiversity studies including habitats and hedgerows on every farm to inform future policy development and measure progress.*

Hedgerows are vitally important to biodiversity and connective for wildlife across our landscape. More are being lost every year, as more land is needed to support a growing herd. The strategy must contain a provision to protect and restore these hedgerows. Otherwise, it doesn't matter how many baseline studies you conduct if by the time you return, they are already destroyed.

Goal 2. Action 2. *Put in place more targeted agri-environmental schemes under the next Rural Development Programme (RDP) to protect and enhance Ireland's habitats and species*

We were heartened to see the Bride Project used as an example in this document. More environment schemes should be rolled out across the country to allow farmers to be paid for the ecosystem service they are providing. The great success of this project shows the interest not only in the public but in the farming community as well, for ways to farm for/with biodiversity. We would like to see agri-environmental schemes set up throughout the country so all farmers could be a part of this. All environmentally destructive agricultural subsidies should be phased out.⁹

Goal 2. Action 6. *Ensure the necessary actions for agriculture are included in the new All-Ireland Pollinator Plan and that they are disseminated to farmers.*

We support this and are encouraged to see this within the plan.

Goal 2. Action 7. *Ensure that farms and forests do not contribute to habitat destruction and isolation, and also protect features of cultural heritage and traditional landscapes.*

We support this and ask for more resources put into the protection and enforcement. Outdoor farm-based educations, especially for families and children is key here. All environmentally destructive subsidies given to farmers should critically revised.

Goal 2. Action 9. *Build on the measures introduced to protect and foster greater biodiversity in forests.*

This is an action we fully support

Goal 3

Agriculture is the biggest pressure on Irish Rivers. It is heartening to see a full goal on water protection. This plan must reiterate Ireland's commitment to being fully compliant with the Water Framework Directive. Water is the lifeblood of the land and society; it must be protected as the scarce and immeasurably important resource that it is. We are encouraged to see the commitment to reduction of phosphorus, nitrogen and sediment into our waters. There needs to be not only a reduction of fertilizers but mitigations put into every farm to protect water courses. E.g. riparian buffer strips, planting trees along rivers, silt traps, etc. Sadly, this strategy does not go far enough. From the actions stated we do not see how Ireland can become good water quality compliant by the deadline of 2027. Much more is needed to protect our water environment. We advocate from the use of mixed swards with clover, natural flood management, permaculture initiatives, farm diversification to improve this Goal.^B

Goal 4. Action 1. *New Forest Strategy for Ireland*

An increase in forest cover would be a welcome sight, but the focus must be on native trees planted in appropriate areas. The current forestry model of planting Sitka spruce in the uplands has been detrimental to the natural environment. Increasing sedimentation and changing the pH of rivers. While also preventing the bogs they were planted on from sequestering carbon. This must be stopped. Native tree planting should be encouraged and non-native commercial trees highly discouraged and as for the case of Sitka spruce completely phased out.

Goal 4. Action 3. *Place farmers at the centre of a new and improved afforestation scheme*

This is something we would support fully with native trees being planted. This increases biodiversity on the landscape and will allow species to recover. It will also allow farmers to diversify their income. If farmers were encouraged to plant non-native conifers we would strongly disagree with this action.

"Finally, since the introduction of the WEF the amount of native woodlands planted as a percentage of total planting has doubled from 10% in 2018 to 20% in 2020"

This is fantastic news and a credit to the scheme. We would like to see it become more ambitious and make a commitment to plant a minimum of 50% native woods planted per year.

Goal 6 Action 1. *Examine biorefining,*

This needs to be greatly expanded as it has the potential to resolve many problems including energy production, surray run off ect.

Goal 6. Action 8. *The industry should urgently pursue more sustainable packaging.*

Single use plastics must be banned for food packaging. This need to be implemented immediately. Fermenting food is a key way to converse food in plastic free ways. We advocate for the support of a FYI Ferment It Yourself initiative across Ireland.

Part 2

During our Podcast series "Tales from the Land". A number of ideas came to the fore again and again. These are not mentioned in the strategy and need to be considered as these are the concerns seen by those who work with the land every single day.

Export focused:

The major flaw with this plan is that it is export focused. The vast majority of the document speaks about finding and developing international markets. Only half a page dedicated to domestic and local Markets. We believed that this should be flipped on its head. The domestic market should be the main drive of this strategy. Of course, changes of this kind

mean a revolution in our thinking of our food systems which can be very hard to address when people have vested interests in the current system. For this process of negotiation, we recommend working with independent facilitations of Non-Violent Communication⁶ and Restorative Practise⁷ to navigate challenging, transformative conversations and find solutions that best meet the needs of all stakeholders. These are the approaches we used during our Tales from the Land inquiry to great success.

We are one of the most food secure nations on earth yet we are not food sovereign. As mentioned above food sovereignty needs to be a main priority. The carbon costs of transporting food across the world is not mentioned.

Cheap Food:

Food is currently at an incredibly low price. These prices do not consider the real cost of producing food: the environmental, social etc. Our current system is a race to the bottom. The cost margins for farmers are incredibly tight leading to more ecological damage. Producers are being squeezed at the bottom pushing out small farmers. Supermarkets and processors on the other hand are making large profits. We are encouraged to see plans to make this more equitable. Although we question "premiumization" as the method to do this. Why should we only grow "Safe, Nutritious and Appealing, Trusted Food" for the export market?

In the 1950's 50% of household income was used to buy food. Now that number is approximately 10%. This is not sustainable and contributes to the continued pressure and stress already put on farmers. Food must be priced at its true value. This makes food more expensive and makes society value it more while also respecting the important work that farmers do as the bedrock of our society. So, the poorest in society do not become adversely affected by this change to other cost of living expenses should be reduced. This would be best achieved by reducing rents across the country. Evidently there is a clear need for a more holistic approach to policy creation where housing needs and food systems can be in conversation with one another.

Local small scale food production:

There is no mention of supports for small producers. Under our current model you can only get subsidies if you are over a certain size of farm. This is a major impediment to people wishing to enter the industry. This needs to be changed. All farmers no matter

their size should be supported and encouraged. This again highlights the need for regenerative agriculture where not only the land is regenerated and supported but also the mental, emotional and economic wellbeing of farmers, food producers and their families.

Encourage production of food in the household:

There is no mention of supporting food production within the household. In the last number of years the use of allotments skyrocketed as well as food growing at home during lockdown. It is clear there is growing interest society at large for growing your own food. Yet there is not a single mention of this in the strategy. This is a major oversight. Citizens should be encouraged to grow food in their own homes. This would have a vast array of benefits.

1. It will reconnect people to how their food is produced
2. Reduce pressure on our food system and drastically reduce transportation related greenhouse gasses
3. Fermented foods increase overall health and could be used as a way to reduce obesity in the nation¹¹
4. When people grow their own food they understand the work that goes into it and would be willing to pay more for other locally produced food.

To this end we recommend that support and training should be made available encourage people to grow their own food. Outdoors equation is key and this approach can help to address the disconnection between food production and consumption in our nation.

The Irish Language:

The Irish language. The language used to describe this landscape for a 1,000 years is conspicuously absent from the strategy. As Michael Cronin notes in his book "Irish and Ecology"² how can we truly protect our natural environment when we have lost the words that are used to describe what we are losing. With the recent explosion of interest in Irish words as seen in the popularity of the book by Manchan Mangan "32 Words for Field," the Irish language needs to be recognized as an incredible resource relating to our food system and all Irish based Climate action. We recommend the committee for the Agri-Food Policy consult with Michael Cronin and Manchan Mangan before proceeding.

Habitat destruction

Habitat destruction is mentioned only once in the strategy. Farming is the biggest contributor to habitat destruction in Ireland, yet it is barely mentioned as an issue. This is a vast oversight. We are encouraged to see "10% of farmed area prioritized for biodiversity" as a target in the plan. Yet we worry this does not go far enough. Firstly, we need to protect the biodiversity we have left, then restore what we have lost. It is cheaper and more effective to look after what is left rather than to recreate what we have lost. Again, we recommend Regenerative Agriculture, farm diversification, planting of native species and permaculture approaches here. Acts such as the 'Noxious Weeds Act' need to be revised urgently.

Farmers must be encouraged to protect the natural environment

Current policies discourage farmers from protecting the natural environment while actively enforcing its destruction. Many farmers we spoke to have told us that they have been forced to cut hedgerow or remove scrubland under threat of losing a percentage of their single farm payment (SFP), the single largest income source for many small farmers. This is idiotic in the extreme and must be stopped immediately. No farmer should be punished for protecting biodiversity, they should be praised. Again we reiterate, all environmentally damaging subsidies must be phased out.

Circular economy

Has been mentioned a number of times in the strategy but not a single measurable goal has been given. We suggest using Kate Raworth's Doughnut Economic Model as an underpinning strategy to work towards a circular economy. We suggest consulting with the Irish Doughnut Economics Network on this as they have already been looking at doughnut economics and the food system in West Cork.¹² Soil regeneration with farm 'waste' and seed saving in-situ are other approaches we recommend.

Decolonisation

We need to clearly acknowledge the colonial roots of our food system. As we are members of the European Union, though we were oppressed for generations, we now also benefit on a colonial system of oppression and land grabbing that is rooted in violence. The only way to move to a restorative and regenerative food system is to acknowledge this deeply rooted trauma. From there we can work to address the issues caused. We need to question the underpinnings of land ownership. As a chief of the Bagobo-Obo Manobo tribe in

Cambodia asks "How can we own something that can outlive us?" We need our policies to help us reframe the truth that we are not owners of the land but stewards of our way of living with the earth. We need our policies as well as our art and literature to help us remember we are intrinsic parts of our natural world and not rulers of it. These are big questions that need to be considered. We acknowledge this is an immense challenge and again recommend the use of Restorative Practise and Non-Violent Communication as ways to broach this subject with various stakeholders and the public.

Conclusion

In conclusion the Environmental Assessment of the Draft Agri-Food Strategy to 2030 is lofty in this ambition but lacking on clear implementation strategies. Production, output, and export are the centerpiece of this strategy. The strategy aims to create sustainability for farmers by concentrating on the export market while forgoing regenerative practices that center local growers and farmers. In essence allowing other people to pay for our "green" agriculture and continuing to mask the true cost of food in Ireland. We believe this strategy is designed to work for industry, processors, and large producers. Smaller farmers, the environment and rural communities are given lip service and largely overlooked.

We, at the Green Step, believe that the environment and people should be at the center of this plan that will guide the agri-food system for the next 10 years. We heard this sentiment numerous times during our conversations with people on the ground engaging with the land and the system. We need to uplift our rural communities, farmers and food growers and ensure that they are cared for mentally, emotionally, physically and economically. Provided a decent standard of living for small farmers, revitalizing rural communities and protecting the natural environment is key. Our current mode of endless production and growth at all costs is not fit for purpose, it never was, and needs to end. The strategy needs to be flipped on its head putting the environment and small producers first, and those of processors and export a distance second.

Thank you sincerely for taking the time to read our submission. To disucss any of the points mentioned here please email [REDACTED]

Kind Regards,

[REDACTED] & [REDACTED]

References:

1. Doughnut Economics by Kate Raworth – Book
2. Irish and Ecology by Michael Cronin – Book
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5. GIY Grow It Yourself: A social enterprise promoting food empathy and growing our own food – www.giy.ie
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7. Restorative Practice in Ireland – www.restorativepracticesireland.ie
8. Understanding the role of genetic selection in the national cattle herd and use of mixed swards and clover to add nitrogen to the soil. <https://shows.acast.com/the-green-step-community/episodes/ag-tech-tools-understanding-gmos>
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11. Fermenting foods and the importance of Irish <https://shows.acast.com/the-green-step-community/episodes/28-an-talamh-gaeilge-food-ferments>
12. Doughnut Economics in Ireland <https://shows.acast.com/the-green-step-community/episodes/doughnut-economics-the-cycles-of-life>



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

The AA is a conservative assessment with little evidence provided to detail how the proposed mitigation measures will bring about the drastic reversal of biodiversity loss and reduce pressure from agriculture on species, ecosystems, and habitats.

The SEA is also extremely generous in its analysis of the sustainability of the current plan and the 'minor tweaks' to current practice or mitigation measures it proposes. It is also weak and inaccurate in its assessment of alternatives, specifically the socio-economic and social dimensions of Alternative 2, which could be mitigated through agricultural subsidies and CAP funds combined with knowledge transfer, advice, and investment in innovation and building resilience through agroecological approaches. While the report acknowledges the significant impact of Irish agriculture on the environment, the mitigation measures proposed avoid tackling some of the most challenging environmental issues, with very little substantive evidence as to how Ireland can meet these ambitious targets with incremental changes in farming practice.

With continued emphasis on technology to address these challenges and very little evidence as to exactly how these measures can deliver the changes required in agriculture to meet national targets and fulfill our EU obligations, neither the SEA nor the AA accurately reflects the deep systemic changes needed across agriculture and the food system to protect the environment and family farms and transition toward an ecosystem-based approach and a truly holistic and integrated sustainable food system.

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

Inaccuracies in the Assessment of "Alternatives 2: Greater Emphasis on Reduced Output" and "Alternative 3: Balanced Approach" in Table 5.1: Assessment of Alternatives (pg. 45). Alternative 2 provides much stronger benefits and performs equally in 5 areas and higher in 4 areas than Alternative 3: Balanced Approach in Table 5.1: Assessment of Alternatives. The 2 areas where it scored lower (Likely adverse effect) presents an inaccurate and misleading assessment that reduced agricultural output will have a "negative impact on the economic viability of primary producers and others in the agri-food sector" and rural communities and lead to "increased economic hardship, stress and a lower quality of life". This does not take into account contextual variants (between producers, e.g. large-scale or small scale), the fact that many producers in the sector are already negatively impacted by the current system that promotes export and increased output over building social and environmental resilience, or the potential for subsidies to mitigate this fallout in shifting toward a more localised food system approach. Furthermore, it is likely that a reduction in output and a focus instead on the provision of locally-produced foods to feed the Irish population and local and regional (EU) (instead of international) markets will have a positive impact (Likely strong beneficial effect) on Population (2) and Human Health (3) (the areas that the current assessment marked as adversely impacted).

This can be achieved if the subsidy system is aligned to ensure a Just Transition and compensate farmers primarily for agroecological practice (taking an ecosystem approach) and the provision of public goods and services (linking payments to performance) including the production of a diverse range of local healthy nutritious foods, carbon sequestration, biodiversity restoration, water purification, flood attenuation and preservation of other essential ecosystem services. The "economic viability of primary producers" is already threatened and is worsening precisely because of the current model. Farmers are already vulnerable and a third of farms unviable due to the current subsidy system. Instead, focusing on reduced output with complementary measures to reward farmers for the right types of farming (e.g. environmentally sustainable food production), diversifying the agriculture system and connecting local producers with local consumers would lead to a healthier environment, healthier diets (enabling the Irish population to avail of nutritious locally produced foods), food and nutrition security (both in Ireland and globally), and build the resilience of rural communities. Reducing output and diversifying the sector combined with a focus on high nature value farming and producing quality over quantity, connecting primary producers directly with consumers and shortening food supply chains would help to address these issues. It would also improve health and wellbeing, increase access to local nutritious foods and ensure farmers receive a fairer price for their product.

Furthermore, the assessment of Option 2 must be backed up by disaggregated data, specifically who will feel the economic impacts of reduced output. Is it big agri-business or small-scale producers? Small-scale producers and family farms are in decline and there is an aging farming population with an average of 65 years old. They are already heavily burdened by the current system, where many are in debt and do not operate viable or profitable farm businesses (Teagasc, 2019). The assessment of Option 2 does not take into account who is currently profiting from the increase in agriculture output (primarily large-scale agri-business) and who this approach is failing (family farms and smallholders). It also does not address the question - who should the system and the sector ultimately be serving? People and planet or the profits of large scale agri-business? Environmental NGOs and civil society (both Irish and EU) have called for reduced output with a focus on high nature value and quality (over mass) produce. The recommendations and voices of these organisations are noticeably lacking, with a continued focus on an 'industry-led' approach, which is no longer an appropriate policy and governance response, given the vulnerability of the agriculture sector, the fragility of the environment the importance of integrated and holistic food system governance to ensure that food systems deliver on environmental targets, health and wellbeing. Reduced output is the first step toward a truly balanced approach. This means shifting the outlook of Irish agriculture away from the commodity-driven, export-focused production of meat and dairy, to bring it in line with the EU strategies and with national obligations on climate, water and biodiversity. Considering this, Alternative 2 in the SEA would be the strongest strategy and an important first step to shifting the outlook of the sector.

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.

On the strategy's high-level objectives and outlook:

Overall, the strategy is primarily a cosmetic updating of the productivist and business-as-usual approach that the previous 2 agri-food strategies have taken, adopting small, incremental changes and offering primarily technological solutions within the existing operational framework. Although it uses the rhetoric of a 'food system' approach, it is far from the holistic and integrated model required to shift the outlook of the sector and deliver the systemic changes needed in agriculture to meet the ambitious environment and sustainability targets and support food and nutrition security and a shift toward healthy diets (nationally and globally). The stakeholder engagement and consultation process was weak and NGO and environmental organisations' perspectives and recommendations are noticeably lacking.

The strategy does not go far enough to address the abuse of animals in agriculture and the unethical and, in many cases, unlawful transportation of animals (in breach of EU law). Time-bound targets are also needed to reduce the herd size with a focus on quality over quantity. In line with other progressive countries (UK, New Zealand), the strategy should present a phase out of live exports and caged farming, in line with the European Citizen's initiative 'End the Cage Age' and the recent almost unanimous MEPs vote in support of the ECI (including 4 Irish MEPs).

A 'food system approach' must take into account food and nutrition security. However, the strategy does not detail how it contributes to food and nutrition security (both nationally and globally). While it recognises the importance of healthy diets, it pushes meat and dairy, despite recent evidence that large amounts of animal produce are neither healthy nor sustainable (EAT Lancet, etc.). A shift in the perspective toward a food system that feeds the Irish people is needed. The role of agriculture in contributing to food and nutrition security and health and wellbeing of the Irish population and supplying the domestic market is completely omitted from the high-level mission and goals framework. This is a crucial component of a "food system approach".

There is a considerable lack of the integration of policy recommendations from civil society and the environment and sustainable development sectors in terms of shifting the priorities of the agriculture sector and a transitioning the outlook of the sector toward a more sustainable agroecological or ecosystem-based model. Stakeholders should be widely consulted and the strategy should be revised to ensure that stakeholders are actively engaged in each stage of design and implementation.

Policies and financial frameworks (subsidies, incentives and CAP) must be aligned to deliver on specific, measurable, time-bound targets for enhanced environmental performance of the sector (including climate, biodiversity, soil health and water quality), building social and community resilience (including health, wellbeing, rural livelihoods, and food and nutrition security for Ireland. The strategy should detail how it plans to ensure the CSPs are used to support family farms, safeguard the environment and encourage diversification and agroecology.

In the context of a biodiversity and climate crisis, with agriculture accounting for the majority of biodiversity loss, water pollution and climate change, participation in biodiversity conservation and climate mitigation measures should be mandatory, not voluntary and there should be an environmental baseline that each farm must meet to receive CAP funds. This is the only way to comprehensively address these pressing environmental challenges. An ecosystem-based and a landscape approach would ensure that the protection of species, habitats and ecosystems is not relegated to the margins or to the already fragile SPAs/SACs.

The strategy should focus on phasing out all environmentally harmful subsidies in the agricultural and food sector to reward the delivery of public goods and services, including providing a diverse range of healthy nutritious foods, carbon sequestration, biodiversity restoration, water purification, flood attenuation and

preservation of other essential ecosystem services.

Specific responses to each section attached.

Additional Supporting Information

If you have supporting documents, please upload here.

where possible, please limit supporting document to under 5000 words

217103cf-44b2-43d2-a7df-a570d9a0d6ab/Agri-Food_Strategy_2030_public_consultation_response_Q6_5.6.2021.pdf

Contact

2030StrategyEnvironmentalConsultation@agriculture.gov.ie

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On the strategy's high level objectives and outlook

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The strategy does not go far enough to address the abuse of animals in agriculture and the unethical and, in many cases, unlawful transportation of animals (in breach of EU law). Time-bound targets are also needed to reduce the herd size with a focus on quality over quantity. In line with other progressive countries (UK, New Zealand), the strategy should present a phase out of live exports and caged farming, in line with the European Citizen's initiative 'End the Cage Age' and the recent almost unanimous MEPs vote in support of the ECI (including 4 Irish MEPs).

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Missions, goals and high-level targets

Mission 1, GOAL 1: Develop a climate neutral agri-food system

Among the strategy's high-level targets are a biogenic methane reduction of a minimum of 10% by 2030, reduce ammonia emissions below 107,500 tonnes by 2030, reduce nutrient losses to water by 50% by 2030 and 10% of farmed area prioritized for biodiversity, spread across all farms throughout the country by 2030 and organic farming to reach 7.5% or utilizable agricultural area by 2030. For the Environmental Pillar, these targets are not ambitious enough.

Agroecology and Regenerative Agriculture

Given the global calls (UN, EU) for a shift toward agroecological farming practices, such as organic and regenerative agriculture, these elements do not feature strongly enough (regenerative agriculture is only briefly mentioned on page 53 out of the AFS2030's 144 pages in the context of research while agroecology and ecological aren't mentioned once). 'Regenerative Agriculture' involves much more than just storing carbon and increasing soil diversity. It aims to build a healthy soil biome without artificial fertilisers while maintaining productivity, given the negative impact of fertilisers on soils. It necessitates agrobiodiversity, few or no artificial fertilisers, and significantly different rotational grazing practices to those that underpin the current nitrogen-fed ryegrass model, which is hindering Ireland's ability to meet its climate and biodiversity targets. Agroecological, regenerative and ecosystem approaches can support Ireland in meeting its targets and should be fundamental elements of the strategy.

Ireland's national herd size

AgClimatise (the current Government emissions reduction roadmap for the sector toward a 'climate neutral agriculture sector by 2050') acknowledges that an increase in the total national cattle herd above current levels will result in failure to achieve its targets. AFS2030 follows this perspective, yet is overly optimistic in its assumption that the approach of the current system, including the use of improved technologies, can mitigate the impacts. A conversation around reduced output and reducing the herd size has been called for by NGOs and environmental organisations. The time for 'stabilising' has passed. A much more drastic approach is needed and a reduction in the national herd will be a key component of Ireland meeting its obligations to the EU and its own national targets. However, AgClimatise is not consistent with the 2020 Programme for Government commitment to reduce emissions by on average 7% per annum or 51% by 2030, as it assumes a stabilisation as opposed to an absolute reduction of methane emissions by 2030. Total emissions of greenhouse gases and nitrate/ammonia impacts must be reduced.

Mission 1, GOAL 2: Restore and Enhance Biodiversity

Baseline biodiversity studies (including habitats and hedgerows on every farm to inform future policy development and measure progress) will likely demonstrate that only marginal improvements will be made while farming systems fail to integrate biodiversity at its core by taking an agroecological approach. Agrobiodiversity and diversification are the key to restoring and protecting biodiversity, ecosystems and habitats. Monocultures and agrochemicals (including antimicrobials) threaten biodiversity and will continue to do so until the nature of farming shifts to one with diversity at the epicentre. This also increases resilience on farms, and is a win-win for farmers and for nature. Creating 'islands of nature' (10% margins and 'buffer zones') and relegating nature to the margins and will not support the delivery of Ireland's biodiversity targets, merely perpetuate a system that at its core is fundamentally and systematically working against nature. There must also be a 'landscape based approach' and a move away from 'voluntary contributions' to more integrated diverse farming practice and biodiversity and environmental baselines. The time for voluntary participation in the conservation and preservation of life on earth must end. Ecocide is threatening our very existence and that of future generations. Agroecology and ecological approaches should not be just an 'option' in which farmers can participate to earn extra credits. It must be systematically adopted in a nation-wide commitment to protecting the environment.

Mission 2: Viable & Resilient Primary Producers

Horticulture is barely mentioned, as with 'regenerative agriculture' and 'agroecology'. Diversity is the key to building resilience, regeneration and ensuring viable and sustainable livelihoods. Policies and financial frameworks must be aligned to support the transition toward a more diverse agricultural model, where

agroecological and regenerative practices are rewarded and subsidised, whereas unsustainable practice is not. The strategy should focus on phasing out all environmentally harmful subsidies in the agricultural and food sector to reward farmers for the delivery of public goods and services, including the production of a diverse range of healthy nutritious foods, carbon sequestration, biodiversity restoration, water purification, flood attenuation and preservation of other essential ecosystem services, thus building the resilience of primary producers and the environment.

Mission 3 Food that is Safe, Nutritious and Appealing, Trusted & Valued at Home and Abroad

While the strategy says that food security and nutrition is a key component, it fails to account for the fact that the current approach is incompatible with ensuring national and global food security. The continued focus on the importance of trade without substantiated evidence as to how the current food system is impacting global food insecurity is insufficient. Advocacy for sustainable healthy diets should be brought into line with the latest science and evidence on what truly constitutes sustainable diets, including predominantly plant-based (EAT Lancet global sustainable diet), and the agriculture system should be brought into line with this model. A 2016 paper in the *Journal Food Policy*, suggests that that a 50% reduction in the consumption of beef (and mutton) will be required if the EU climate targets are to be met. Instead, international advocacy for sustainable healthy diets seems to centre around ensuring there is a market for beef and dairy internationally, where a disproportionate amount of land use is already dedicated to meat production. While the chapter recognises that consumers are moving toward plant-based diets, it continues to focus on livestock production and promoting the meat and dairy sectors to meet global demand, which contradicts goals to halt environmental degradation and restore the environment. This poses a significant threat to meeting environmental targets and a missed opportunity to capitalise on the potential for an increase in tillage and horticulture to improve food and nutrition security and contribute to a shift toward healthy diets.

Ireland is experiencing an increasing rate of diet-related non-communicable diseases (NCDs) linked to high levels of processed foods and increasing numbers of households are unable to access nutritious food, despite the seeming 'abundance of choice'. The Department of Health (DOH, 2016) estimates the direct and indirect cost of unhealthy diets in Ireland at roughly 1.13 billion euro per annum. In addition to the considerable health costs, the Irish tax payer will also be fronting the cost of non-compliance fees to the EU for failure in meeting emissions, water quality and other environmental targets. It is estimated that up to 600 million euro per year will be coming out of general tax revenues until Ireland can meet its emissions reduction targets (An Taisce, 2019).

Poor diet and NCDs such as diabetes, heart disease and stroke account for almost nine out of ten deaths in Ireland (88%) and are becoming increasingly prevalent. Food insecurity and malnutrition are also persistent problems in Ireland and 10% of the population experience food poverty. "Food poverty" is defined as the inability to have an adequate and nutritious diet due to issues of affordability or accessibility. The cost of healthy food is a major contributing factor in people's inability to access a healthy diet but food poverty is multidimensional. Among the barriers to a healthy diet are competing pressures within a limited household budget and the unavailability of local stores that stock an adequate range of healthy foods (McMahon and Moloney, 2016). One in nine children go to bed hungry every night in Ireland because they are living in poverty. A 2017 Eurostat study found that Ireland is one of the most expensive countries (fourth highest) in Europe for food and drink. Because Ireland imports roughly 85% of its food (DAFM, 2019), the food system is vulnerable to the volatility of the market, which makes cheap, mass-produced, processed foods more affordable than fresh, local, sustainable produce. In 2017, Ireland imported almost eight billion euros' worth of food and drink. As long as heavily-subsidised imported foods remain cheaper than local sustainable produce, healthy food will remain inaccessible to many and unhealthy diets will increasingly contribute to declining health rates. The poorest and most vulnerable communities and households and those that can't access or afford healthier produce are more susceptible to the distributional implications of an inequitable food system, including diet-related health problems, food poverty, and food insecurity. Until food system governance takes a rights-based approach and

food is valued and governed as a human right, the food system will continue to perpetuate distributional issues and act as a barrier to food security and nutrition.

The sector should focus on producing sustainable produce for Irish and local (EU) markets, with a focus on quality (over quantity) of output, which means a more diversified agriculture sector with an increase in horticulture and plant-based foods. This also means increasing subsidies for and incentivising horticulture and agrobiodiversity. Ireland should not be in the top five most expensive countries in the EU for food and drink given its strong identity as an 'agricultural' country. The people of Ireland are fronting the cost for an inefficient and inequitable system, where the land and resources are not being used efficiently and the potential for the food system to deliver on food security is not being harnessed. The current agriculture system is contributing to food and nutrition insecurity by using much of Ireland's land and water to produce meat and dairy for export, thus denying the Irish population access to locally-produced healthy sustainable and nutritious foods. Ireland is one of the lowest performing countries in the EU on its environmental targets and until agriculture is brought in line with agroecological approaches in food and farming and the outlook of the sector shifts toward a more diverse ecological model, Ireland will continue to be viewed as a laggard.

Goal 1: Prioritise Coherent Food and Health Policies to Deliver Improved Health Outcomes

In the Healthy Ireland Strategy and the National Obesity Policy and Action Plan (the two national policies that outlined measures to address diet-related health issues), the Department of Health noted explicitly that the determinants of health remain predominately outside the traditional public health domain. Therefore, merely encouraging people to eat more healthily is an insufficient and ineffective policy response. Furthermore, because most of Ireland's produce is exported, consumer choice doesn't have a large impact on Irish agriculture. Food and nutrition security is determined by a number of complex factors, including the availability, affordability, usability and stability of local, healthy, nutritious foods. This means that the health and wellbeing of a population is largely dependent on the capacity of a country to ensure a diverse range of safe, nutritious, affordable, local produce. Ensuring policy coherence across the food-environment-health nexus to ensure agriculture contributes to food and nutrition security (both in Ireland and abroad) entails a shift in the outlook of the sector to deliver on food and nutrition security objectives. Policy Coherence does not happen by merely 'aligning strategies'. It necessitates a systemic approach, ensuring comprehensive stakeholder engagement, horizontal (across government departments) and vertical (across sectors and integrating local, regional and national levels of administration) to maximise synergies and minimise trade-offs between and across sectors and policy areas (e.g. food, environment and health). This requires a much more integrated approach to governance across the agriculture, environment and health departments. The strategy should include how it plans to more actively engage with other departments and a wider range of stakeholders to deliver improved health and environmental outcomes. The question of how Irish agriculture production can be localised to deliver food and nutrition security and shorten food supply chains should be central to the strategy, if it were to take a genuine and comprehensive 'food system' approach.



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:

Myles

* Surname

Rath

* Country

Ireland

* 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

Researcher/Academian (Retired)

* 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

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.

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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.

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Submission on the Draft Agri-Food Strategy to 2030
(Dr. Myles Rath, UCD-Retired, 15 June 2021)

A Lesson from the Milk Quota and Super-levy Era –

Reducing Milk Output in Ireland will do Nothing to Reduce Global Warming, and may Increase It

I have watched with increasing alarm and almost despair the direction of the debate about the role of milk production in Ireland and the completely misguided policy framework for green-house gasses that will severely constrain the development of dairying and will lead to the gradual erosion of a viable farming industry and a sustainable rural community. The current policy direction will do virtually nothing to reduce global greenhouse gasses and is more likely to lead to an increase in greenhouse gasses and global warming. The fatal flaw in the EU policy that Ireland is following is that it requires Ireland to manage the greenhouse gasses from dairying (and beef) on a national basis while the dairy industry operates on a global basis.

What can we learn from the milk quota and super-levy era?

Most people are aware that the EU introduced the milk quota system to limit expansion in 1983. They are aware that for 30 years milk output in Ireland and in the EU stalled but that milk output powered ahead in New Zealand especially. However, this is only a small part of the picture of what happened with milk output

on a global basis since 1983. In order to get a more complete picture of the changes in milk output I ploughed through the FAOSTAT section published by the FAO (Food and Agriculture Organisation of the United Nations) with the emphasis on milk output from dairy cows in 1983, 2013 and 2019.

Some of the main items of information to emerge from the data are as follows:

- 1 As reference points milk output in 1983 was 5.5 mt (million tonnes) in Ireland; it was 162 mt in the EU28 and the world output was 450 mt.
- 2 In the six years from 2013 to 2019 milk output in Ireland rose from 5.6 mt to 8.2 mt, in the EU it rose from 152 mt to 167 mt and globally it had powered further ahead from 634 mt to 716 mt.
- 3 Probably the most startling change overall has been the increase in global milk output from 450 mt in 1983 to 634 mt in 2013 and on to 714 mt in 2019. This global increase occurred even though EU milk output fell during the quota period and there was a dramatic drop in milk output in Russia and associated countries in the early to mid 1990s following the collapse of the Soviet Union.
- 4 Over half the global increase was in Asia, and India was responsible for nearly half the increase in Asia. Some of this increase was not a true increase but represented milk that was delivered for processing instead of being consumed locally. Much of this is not in direct competition with Irish dairy exports.
- 5 Of more relevance to Ireland and to the likely effect of changes in milk production in Ireland on global warming are the changes in milk output in the (a) North and South America especially in the US and Brazil, (b) in New Zealand and (c) in the other EU countries following the removal of milk quotas. These countries increased milk output by way in excess of 100 mt from 1983 until 2019. Milk output in China increased from almost nothing to over 30 mt by 2019. Overall milk output in Ireland and the recent increase in milk output in Ireland are very small when compared with overall milk output and the recent milk output increases in these "direct competitor" countries.

Dairying is a global industry. Bord Bia stated that in 2019 Ireland exported dairy products to 124 countries, with the UK, Netherlands, China, Germany and the US being our largest markets, while Indonesia and Malaysia showed dramatic increases. If Ireland fails to supply butter to the markets in the UK, Germany or the US or fails to supply any of its milk powders to China or to many of the under-developed and developing countries it currently supplies, you can be certain that all these markets will quickly be supplied by the dairy industries of a number of other countries, probably from an expansion of their dairy industries.

This is precisely what happened when milk output decreased quite sharply in Europe in the 1990s, but output powered ahead in many other regions in the world. Dairying in Ireland is one of the most efficient in terms of green-house gasses per unit of milk output, and is dramatically less than in countries like Brazil.

This is the reason why, fundamentally, limiting the dairy herd in Ireland would, almost certainly, lead to an increase in green-house gasses and an increase in global warming. We would then have achieved the ludicrous outcome of decimating the rural community while simultaneously increasing global warming.

Additional Supporting Information

If you have supporting documents, please upload here.

where possible, please limit supporting document to under 5000 words