



12/06/2021

Food Strategy 2030 Submission

To whom it may concern,

My name is  and I am a dairy farmer, milking 72 spring-calving dairy cows in  of North Cork. I would like to express some concerns I have with the direction our farming and food system is taking and in particular my concern that the road that we are now on as a result of the Food Harvest 2020 and Foodwise 2025 Strategies is unsustainable.

While the draft 2030 report contains aspirations that look very positive and the proposed goals are what is needed, nevertheless the saying that paper doesn't refuse ink comes to mind.

These are some of the concerns I would like to see addressed in the new Food Strategy 2030.

The make-up of the committee is weighted heavily against the farmer and in favour of the processing and marketing sector, and this has been the case in the previous strategies also. The environment has obviously played second fiddle to production and volume of food produced.

Why isn't the committee made up more of farmers who should decide on what they can deliver in 2030 not on what food companies decide what farmers should deliver? The farm organisations are not known to be supportive of environmental improvements (some are against the Green Deal) and I feel they are not representing farmers who want to deliver a better, more sustainable and environmentally-friendly food product to the consumer. Put the farm organisations and the food processing sector together and you have very few people left in the Food Strategy 2030 committee to promote and push for better and higher environmental standards. Add to this the withdrawal of the Environmental Pillar and it doesn't bode well for a badly needed change in policy and direction.

Since quotas were abolished in 2015 and indeed since preparations began for same back in 2010, farmers have been pushed to produce more for the same money with the result being massive damage to wildlife habitats, biodiversity and water quality. We are also struggling to reduce our carbon footprint and the public backlash dairy farmers in particular are now getting is a direct result of the unsustainable food production system we've been on.

This same model has done a lot of damage to rural Ireland with small farmers coming under increasing pressure to stay afloat and many of them have gone out of business. The media narrative often focuses on the "family farm" – it sounds good but we need to define

“family farm”. It is taking an increasingly larger farm to sustain a family and most farms require one of the partners to work off farm. This puts more pressure on the farmer to get more work done to milk higher numbers of stock so extra labour is needed which is becoming more and more difficult to source. Once a labour unit is sourced, inevitably more cows are also sourced to pay for the labour and thus begins the treadmill on which dairy farmers now find themselves – this is the dairy expansion model – not the family farm model and certainly not the “viable” small farmer model. The average herd size in the Glanbia area is now over 80 cows so under this figure would be classed as a small dairy farmer.

In dairy farming, the milking platform (land area adjacent to the milking parlour) is the limiting factor to expansion, so to expand i.e. increase production to stay viable, as price for milk to the farmer is more or less static over the years, farmers require more land. In my own area, land rental costs can be up to and more than €300/acre/annum – to buy this land would cost a minimum of €10-15,000/acre and more if 2 farmers want it badly enough. So to increase herd size by 50 cows would require 50 extra acres costing a minimum of €0.5m – the smaller the scale, the less chance of being able to get on this unsustainable ladder.

To give an actual example of what’s happening on the ground, in my own case, I have 2 tillage neighbours, 1 bloodstock neighbour, 1 suckler neighbour and 2 dairy farmer neighbours. For any of us to expand would mean to buy the adjoining farm and put them out of business – The only way for me (or them) to expand is to buy an adjoining farm. This is the model we are on and is leading to smaller farmers getting out, an ultimate decline in overall farmer numbers and ultimately a depleted rural community.

This model is pitting farmers against farmers, dairy farmers against each other and against every other farm enterprise and as can be publicly seen, pitting farmers against environmentalists and the consumer.

Everyone is talking about the extra jobs that dairy expansion is giving, no one is talking about the numbers of small farmers that cannot compete and are going out of business. Some examples of the pressures of competing at a small scale in my own experience are

- Last year I went to purchase a 1 litre cattle dose only to be told that they “don’t stock it much” as it was mainly 5litres packs that farmers were looking for – enough to last me for 5 years and would be expired in 2.
- Contacted a company recently that sell in-calf heifers. Having waited over a week for them to contact me, I asked another farmer who told me “they’re only interested in larger numbers”. I then sold them on Done Deal.
- Glanbia’s minimum milk collection policy has now increased from 250 litres per collection to 400 litres per collection – this is just another nail in the coffin of small milk producers.

Because this model is totally production focused and with no incentive to look after biodiversity or any other ecosystem service, farmers are sent the signal to produce more and more to fuel the relentless drive for a commodity product that can be sourced cheaply. Inevitably more and more fertiliser is used, more sprays are used on any plant that is competition to the crop, wetlands are drained, hedgerows are removed, woodland and forestry converted to grassland etc. etc. (all legally, habitats have very little protection especially in intensive farming areas where most of the food is produced).

There has been a continuous push on farmers to produce more and more for less and less with a devastating impact on the environment. Habitats have been removed and altered in a relentless drive to supply the raw material whether it be milk, cereals or meat to large often global food companies.

While a figure of 10% of the farmed area "prioritised" for biodiversity is mentioned, the text should be stronger as there is no strategy setting out how this can be achieved. This seems to me to be a purely aspirational figure. In practice this will mean some intensive farmers may need to take out up to 20 acres to attain the 10%. Does the farmer have to pay for this or who will compensate for the loss of income.

Part of the problem with biodiversity decline is that there is no value on that 10% so if a farmer were to plant 20 acres of woodland, install a pond, plant a hedgerow or create buffer strips etc. there would need to be a continuous payment to the farmer for delivering the ecosystem services these measures will bring. When land is taken out of agricultural production it must be replaced with an environmental payment that incentivises the farmer on an ongoing and indefinite basis to deliver the ecosystem services that other land uses can provide such as clean water, flood prevention, more biodiversity, carbon sequestration etc. etc. This payment should be results-based as in the BRIDE Project template so that farmers will be incentivised to manage their land both for environmental benefits and food production.

The present CAP payment structure should be reformed to include an environmental payment of a minimum of €1000 per hectare to farmers for this 10%. This puts a value on the habitats and biodiversity that are being lost and sends a signal to the farmer that maintaining these habitats is important. €1000/hectare is good value for delivering ecosystem services especially considering we have a global climate and biodiversity crisis.

Ireland Ag. is at a crossroads - we can go down the road of increased expansion and racing to the bottom of the barrel to be the most efficient food producers in the world but with the worst environmental record and a farming population that are tired and stressed in that race. Our future young farmers will have other more profitable and rewarding occupations to choose from with better work conditions if we do not make changes.

Our credibility and the Origin Green credibility is under serious threat, we cannot any longer proclaim to be sustainable (needs to have an agricultural definition) food producers while the public are well aware of the environmental problems that intensive farming is causing. Time has caught up on poor and lax environmental care over the years because of bad short-term policy.

In recent discussions on the draft document it has been suggested that “there needs to be give and take” – in my opinion there has been too much take from the farmers and the environment over the last 20 years, both have been exploited and this needs to change.

Thank you for reading my submission.

Kind regards,



**Response to the Department of Agriculture, Food and the Marine
Public Consultation on the Draft Agri-Food Strategy 2030**

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Introduction

The Irish Congress of Trade Unions (ICTU) welcomes the opportunity to set out our views on the Draft Agri-Food Strategy to 2030, as presented by the Department of Agriculture, Food and the Marine (DAFM)'s public consultation.

ICTU is the representative confederation of 43 trade unions in the Republic of Ireland and in Northern Ireland. These unions have a total membership of over 700,000, more than 500,000 in the Republic of Ireland and 200,000 in Northern Ireland, working in every sector of the economy. This makes ICTU one of the largest if not the largest and one of the most representative civil society organisations on the island of Ireland. Our core mission is to 'strive to achieve economic development, social cohesion and justice by upholding the values of solidarity, fairness and equality'.¹

ICTU is also affiliated to the European Trade Union Confederation (ETUC). This represents trade unions confederations in all European Union (EU) member states and across the wider Europe. Through the ETUC we engage with the EU institutions, particularly the European Commission, the European Parliament, and the Council on EU matters.

Our affiliated unions represent tens of thousands of agri-food workers, and seek to engage with employers, Government and other relevant stakeholders across the entire agri-food sector on matters affecting their members.

This response therefore focuses on what we see as the main issues that are not addressed or inadequately addressed in the draft strategy as well as the main concerns and criticisms that we would have with the draft strategy.

We would like to begin by addressing the ongoing evolving policy context for Ireland's agri-food sector, as partly recognised by the draft strategy.

An evolving Common Agricultural Policy

'Over the past decades the EU's CAP has been the major focus for Ireland's agri-food sector... The new stage in the CAP's evolution will have noticeably higher environmental ambition with national Strategic Plans focusing on economic, environmental and social goals across nine key objectives

(Draft strategy, pages 21-22)

Almost all economic activity in Ireland's agri-food sector is determined or influenced by decisions taken at EU level in relation to the Common Agricultural Policy (CAP). Much of this activity is in fact entirely reliant on the funding provided through CAP to subsidise the 'market' prices received by many primary producers. As the draft strategy points out (p.40), CAP supports accounted for 78% of Family Farm Income in Ireland in 2019, with an average total direct payment of just over €18,300 per farm, and 'the CAP Strategic Plan will provide in excess of €12 billion in funding to

¹ ICTU Mission & Objectives <https://www.ictu.ie/about/>

farmers and rural communities between 2023 to 2027'. This funding of course represents a very substantial *indirect* subsidy to the agri-food processing industry.²

The draft strategy recognises that 'while the CAP will continue to be of crucial importance' over the coming years,

'[t]he European Green Deal (EGD) represents a fundamental political and policy commitment towards Europe becoming the first climate neutral continent by 2050. The Farm to Fork (F2F) is at the heart of the EGD: it addresses the links between healthy people, healthy societies and a healthy planet. The F2F, Circular Economy and Biodiversity Strategies, taken together, will require substantial change in how we farm and fish, manage our forests and how we process, distribute and consume food and bio-based products.' (Executive Summary, p.16).

We welcome the fact that the draft strategy broadly supports 'the direction of these policies.'³

We also welcome the fact that the draft strategy states that the 'world needs to meet the commitments on the Sustainable Development Goals' (p.14), stating that nearly all of the SDGs 'link either directly or indirectly to the food system', that 'there is an onus on us to conceive, develop and implement policies that address these goals, including agri-food policy' (p.38) and that the F2F strategy is 'central to the EU's achievement of the UN SDGs' (p.40).

Unfortunately, we see little or no subsequent consideration of this ongoing 'evolution' or of commitments *in relation to agri-food workers* and in fact see a number of recommendations that go in the opposite direction, i.e. to the further detriment of agri-food workers.

First, the draft strategy states that the terms of reference for the Stakeholder Committee sector required it to 'outline the vision and key objectives, with associated actions, to ensure the economic, environmental and *social sustainability* of the agri-food sector in the decade ahead.' (p.2, emphasis added). 'Social sustainability in turn defined as entailing 'broad based benefits for society' (p.2). It is clear however that this concept of social sustainability is considered only in relation to primary producers (e.g. from Goal 4 in Mission 2); no-where is it stated or implied that social sustainability also applies or should apply to agri-food workers.

Second, the draft strategy does not appear to reflect the recognition in the F2F strategy that

'The COVID-19 pandemic has also made us aware of the importance of critical staff, such as agri-food workers. This is why it will be particularly important to mitigate the socioeconomic consequences impacting the food chain and ensure that the key principles

² Section 4 of ICTU's recent report *Ireland's meat-processing sector—from a low-road to a sustainable high-road strategy*, documented the extent of the public funding and support for red meat producers (ICTU, February 2021).

³ Adding that 'Ireland will need to proactively engage to influence the direction of the implementing regulations under each of these initiatives, to take account of national circumstances and legitimate interests and concerns' and to conduct 'detailed impact assessments'. P.16.

enshrined in the **European Pillar of Social Rights**⁴ are respected, especially when it comes to precarious, seasonal and undeclared workers. The considerations of workers' social protection, working and housing conditions as well as protection of health and safety will play a major role in building fair, strong and sustainable food systems' (European Commission 2020:11, emphasis in original).

Finally, the consideration of the UN SDGs in the draft strategy appears to entirely ignore UN SDG 8, which seeks to 'Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all', including labour rights (emphasis added).

The next section sets out how we see as the (limited) consideration of agri-food workers in the draft strategy.

The limited consideration of agri-food workers

The draft strategy considers agri-food workers mainly as follows:

Under Goal 6 - on 'attracting and nurturing diverse and inclusive talent' - three specific measures are proposed under Action 2 'to address labour shortages in some key areas'. These are:

- a. 'Employers across the agri-food sector will make operational roles more attractive to Irish and EU workers including ensuring that pay and conditions are comparable with similar roles in other sectors and the provision of training and development opportunities, including language skills
- b. More responsive and flexible labour and immigration policies will be pursued. Where recourse to employment permits is needed, and recognising that this should be the last resort for filling vacancies, stakeholders should work together to prove that this option is necessary. In addition, efforts should continue by the Department of Enterprise, Trade and Employment in introducing a seasonal employment permit facility in new employment permit legislation. Greater efforts should also be made by employers to ensure that these workers are fully integrated into the workforce and offered attractive career progression opportunities.
- c. The People in Dairy Action Plan will be implemented in order to address specific labour issues in the dairy sector.⁵

With regard to Action 2a, it should be noted that the consideration of pay and conditions of *Irish and EU* workers (note, disgracefully, *not* migrant workers from other non-EU countries) here is the only apparent consideration of these issues in the entire 144-page draft strategy, and then only to ensure that they are 'comparable' with similar roles in other sectors and with the objective of

⁴ Of particular relevance to agri-food workers in Ireland are the principles under Chapter II – Fair Working Conditions, including preventing precarious working conditions (principle 5); ensuring fair wages (principle 6); encouraging unions and employers to 'negotiate and conclude collective agreements in matters relevant to them' (principle 8); and ensuring workers have a high level of protection of their health and safety at work' (principle 10).

⁵ Implementation of the *People in Dairy Action Plan* is also proposed under Goal 1 on improving the competitiveness and productivity of primary producers, to 'address labour issues facing the sector.'

addressing labour shortages' and *not* with the objective of promoting decent work, which would be in line with Ireland's commitments under the SDGs as well as the European Pillar of Social Rights.

The call under Action 2b for 'more flexible labour and immigration policies' does not take any account of the impact of the such 'flexible' labour policies to-date. In this regard, it should be noted that even the departmental 2013 report on *Extending Social Insurance Coverage for the Self-Employed* by the Government's Advisory Group on Tax and Social Welfare acknowledged that:

The issue of "disguised employment" remains a serious concern, particularly in the construction and *food processing* sectors. Employment trends over the last two decades towards greater flexibility and casualisation have resulted in low paid and precarious employment, with some workers being classified as self-employed even though they might not possess those characteristics of entrepreneurship and risk-taking often perceived as features of the self-employed.' (p.10, emphasis added).

Nor does this call under Action 2a take account of the widespread recognition since the pandemic began of the role of such 'flexible' labour policies in contributing to the severity of Covid-19 outbreaks in the food processing sectors. The Final Report of the Oireachtas Special Committee on Covid-19 responses (October 2020) stated that

'While meat processing is highly regulated regarding food safety and hygiene, *the same level of regulation and protection is not extended to workers and their conditions of employment.*'

And the Chair's Foreword to the Final Report stated that

'There needs to be a further focus on the operation of [the meat] industry and an examination of the State's *unusual and unhealthy lack of oversight of the sector.*'
(p.18, emphasis added in both)

The Final Report consequently made a number of specific recommendations concerning the agri-food sector. These included the introduction of sick pay for employees⁶, a review of the role of employment agencies and the establishment of a task force to examine the terms and conditions of its workers.

It did not however recommend the adoption of a direct employment model, as strongly recommended by ICTU, SIPTU and others and has since been adopted in a number of other countries that saw similar outbreaks in food processing, notably Germany.

With regard to the call under Action 2c with regard to the 'People in Dairy Action Plan', we do need to point out that this plan was issued in 2018 by a stakeholder group representing primary

⁶ The Meat Industry Ireland told the Oireachtas Special Committee that a survey of its members indicated that 'approximately 20% of the [meat processing] workforce is covered by sick pay'.

producers, employers, Teagasc, DAFM, the Department of Business, Enterprise and Innovation, and a farming journalist, but not any trade union representation.

Five of the six 'key initiatives' that Action Plan identified to address the 'short and long term human capital needs' on dairy farms involved immigration. This included the recruitment of workers from within the European Economic Area, 'where employment permits are not required'; seeking more employment permits for workers from non-EEA countries, and facilitating workers from New Zealand to work in Ireland for 'short periods'.⁷

The Action Plan also spoke of the need for a 'sustained multifaceted campaign ... to change the *perception* of dairy farming from one of long hours, physically demanding work and poor remuneration to that of a modern, high-tech industry with career opportunities and advancement possibilities at many levels, embracing good working conditions, and with good earning potential for both employees and owners.' (emphasis added).

The Action Plan finally committed to develop by Q2 2019 'a work place charter for the Irish dairy industry in relation to hours of work, pay, health and safety, communication and career development. This should be an agreed standard to which the industry aspires to operate. The charter would clearly specify the rights and duties of both employers and employees'. It is disappointing to have to point out that it was proposed that dairy employees were not to be involved in any way in the development of an '*agreed standard to which industry aspires to operate*', concerning their terms and conditions. It is not clear what has happened to the development of this charter in the intervening time.

Conclusion

The draft strategy refers to the 'key issues which will shape the next decade [as including] people and demographics; planning within planetary boundaries; health and nutrition; and innovation, competitiveness and human capital.'

We believe that the position of agri-food workers, which has hitherto been largely neglected in Irish agri-food policy, is likely to play a more important role in future EU agri-food, and hence Irish agri-food, policy in the years ahead than is recognised by the draft strategy. We would in particular highlight - and very much welcome - that the EU is debating the introduction of social conditionality in the national CAP strategic plans in order to ensure compliance with applicable working and employment conditions and employer obligations resulting from national, EU or international labour law as well as relevant collective agreements, and also point out and again welcome that the European Council's Porto Declaration of 8 May 2021 states that the 'implementation of the principles in the European Pillar of Social Rights will be *essential* to ensure the creation of more and better jobs for all within the framework of an inclusive recovery.'

ICTU's February 2021 report on Ireland's meat processing sector argued that Ireland's meat processing model was becoming less and less sustainable *on its own terms* even before the Covid-

⁷ It should be noted that the Action Plan did not address obvious issues such as the housing needs of migrant workers, including those in Ireland for 'short periods'.

19 pandemic, which starkly revealed its vulnerabilities. That report pointed out that while turnover and employment both increased by 40% in the decade after 2008, investment levels remained low, resulting in stagnant turnover and low-value added *per employee*, and all against the backdrop of low wages and social security contributions and benefits. This 'low-road' approach means that this sector, which is heavily reliant on indirect and direct public funding, is not making the social and economic contribution it is capable of making and, crucially, leaves it ill-placed to meet future challenges.

The draft strategy states that

'The unique aspect of this strategy and those that preceded it is that it has been developed by a broad range of stakeholders from across the agri-food sector. This form of 'participative' deliberation and involvement in preparing the strategy means that the sector itself is its owner and has a strong interest in successful implementation.' (Draft strategy, p.134)

The 'broad range' of 32 stakeholders listed includes representatives of primary producers, employers, retailers, banks, government departments, state agencies, academia, as well as of a number of environmental organisations. It is disappointing to again have to point out the Stakeholder Committee does *not* contain any representatives of agri-food workers' unions and equally regrettably, that there is no apparent consideration of ensuring that unions are involved in finalising and in implementing the strategy.⁸

On the basis of the draft strategy's own understanding of the role and impact of the Stakeholder Committee (p.133), since agri-food workers are not represented on the stakeholder committee that develops the strategy, they are not 'owners' of the strategy and will not have a 'strong interest in successful implementation'.

While the Stakeholder Committee was appointed in late 2019, we do now note that the June 2020 *Programme for Government – Our Shared Future* of the current government states (p.22) that

'The Government recognises the importance of regular and open engagement with all sectors of society. This is particularly important as we steer our way out of the pandemic, rebuild our economy, and support communities that have been severely impacted by COVID-19.

And that it commits to 'create new models of sectoral engagement' (p.22).

It follows that trade unions representing agri-food workers should be appointed to the existing Stakeholder Committee to finalise the agri-food strategy and to structures involving stakeholders

⁸ The only apparent engagement with workers' representatives that we see arising from the draft strategy would be an indirect engagement from the recommendation (p.128) to 'Actively engage with the National Competitiveness and Productivity Council (NCPC) and other relevant stakeholders on competitiveness and ease of doing business issues, especially on issues specific to the agri-food sector'; there is one ICTU representative among the 14 Council members, as well as seven employers' representatives.

in the implementation of the strategy. ICTU and our affiliated unions would welcome this opportunity.

This incidentally would also ensure that Ireland is not potentially in breach of obligations under the Regulation on *establishing rules on support for strategic plans to be drawn up by Member States under the Common agricultural policy (CAP Strategic Plans)*⁹, which is currently being negotiated at EU level. As DAFM and other stakeholders will be aware, Article 94 (3) of the Commission's proposal stipulates that

'Each Member State *shall* organise a partnership with the competent regional and local authorities. The partnership *shall* include at least the following partners:

- (a) relevant public authorities;
- (b) economic and *social partners*;
- (c) relevant bodies representing civil society and where relevant bodies responsible for promoting social inclusion, fundamental rights, gender equality and non-discrimination.

Member States *shall* involve those partners in the preparation of the CAP Strategic Plans.'
(emphasis added)

ICTU and our affiliated unions would be willing to engage further with the Government and other relevant stakeholders in the finalising and implementation of the strategy, including to ensure that Ireland's CAP Strategic Plan complies with EU law as well as Ireland's commitments concerning the UN SDGs and the European Pillar of Social Rights.

ENDS

⁹ COM(2018)392 final

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