

Minister McConalogue
Department of Agriculture, Food and the Marine
Agriculture House, Kildare Street
Dublin 2

7th December 2021

Re: Public Consultation on Ireland's draft CAP strategic plan 2023-2027

Dear Minister McConalogue,

Thank you for the opportunity for Irish Doctors for the Environment to provide a submission on the draft CAP strategic plan for 2023-2027

This submission represents the views of Irish Doctors for the Environment and is supported by the CAP working group, our Consultant Advisory Board and other affiliated groups.

Introduction

Humanity relies on the earth's natural systems to regulate the environment and maintain a habitable planet. The diversity of life - biodiversity - in any given region creates ecosystems of interacting individual organisms, across many species, that collectively contribute to and support key processes that are essential for our existence.

According to the United Nations Environmental Program, Our global food system is the primary driver of biodiversity loss, with agriculture alone being the identified threat to 24,000 of the 28,000 (86%) species at risk of extinction. The global rate of species extinction today is higher than the average rate over the past 10 million years.

In the last decades our food systems have been following the "cheaper food paradigm", with a goal of producing more food at lower costs through increasing inputs such as fertilizers, pesticides, energy, land and water. This paradigm leads to a vicious circle: the lower cost of food production creates a bigger demand for food that must also be produced at a lower cost through more intensification and further land clearance. The impacts of producing more food at a lower cost are not limited to biodiversity loss. The global food system is a major driver of climate change, accounting for around 30% of total human-produced emissions (UN Environmental Program 2021).

Over 71% of Irish land is covered by agriculture, of which a huge 92% of this agricultural land is used solely to produce animal products such as ruminant meat and dairy, and a mere 1.5% is used to grow fruits, vegetables, and other plant foods (Teagasc 2017). The Irish agricultural system, which is heavily focused on ruminant agriculture, is an outlier within the

EU, for negative reasons. Firstly, the average agricultural contribution to GHG emissions in EU countries is around 10% of total GHG emissions, whereas in Ireland, our agricultural sector contributes towards over 35% of our total GHG emissions (Donnellan and Hanrahan 2016). Secondly, compared to a European average of well over 40% forest cover, Ireland has the lowest forest cover among EU countries at just 11%, primarily due to high deforestation rates for livestock agriculture (Department of Agriculture, Food, and the Marine 2020).

Given these enormous challenges, we welcome the focus on biodiversity protection and restoration in Ireland's draft CAP strategic plan 2023-2027. In the nine strategic objectives listed, we particularly welcome the following three:

- **d) contribute to climate change mitigation and adaptation, including by reducing greenhouse gas emissions and enhancing carbon sequestration, as well as promote sustainable energy;**
- **e) foster sustainable development and efficient management of natural resources such as water, soil and air, including by reducing chemical dependency;**
- **f) contribute to halting and reversing biodiversity loss, enhance ecosystem services and preserve habitats and landscapes;**

However we must ensure that these are not treated as lofty ideals, to be given lip service and then sidelined. These must be regarded for what they are, absolutely essential actions for the preservation of our ecosystems on which we all depend for life. Failure to deliver on these goals will mean the inability to continue to live and farm productively in Ireland, with profoundly negative consequences both for Irish farmers and indeed all of Ireland.

To that end we would like to focus on some areas that we feel could be improved, and we would like to make some key recommendations

Organic farming and Horticulture

Soil has been cited as being simultaneously the complex living system on earth and also the basis of all civilisation (Haygarth 2009), as such we must do more to protect this waning resource. There is evidence that current agriculture practices have resulted in a decrease in the biodiversity of EU soil (Gardi et al 2013), hence the call for an increase in organic farming to 25% of all agricultural land (Farm 2 Fork and EU Biodiversity Strategy 2030). Increasing the organic content in soil will not only aid carbon sequestration, but will also increase the quality and productivity of farming practice. There are a growing number of independent organic farmers throughout Ireland who have shown that organic farming can flourish and enrich local communities. Furthermore, Improving soil quality will also add resilience to predicted future climate events such as flooding and droughts.

Approximately 3,000 tonnes of pesticides, insecticides, fungicides and herbicides are released into the Irish Environment each year ([pcs.agriculture.gov](https://www.pcs.agriculture.gov)). The SEA report acknowledges that Ireland is starting from a low base with respect to organic farming, and an interim of 7.5% organic farming is realistic albeit falling short of the EU targets. Supports for farmers via CAP in addition to supports to develop organic markets, nationally and internationally, are also recognised. However, while the continued reduced use of pesticides, herbicides etc is recognised the total usage is unlikely to drop if there is an expected increase in the size of the export sector of agri-products as outlined by the Agri Food 2030 strategy.

Conversely, diversification (agroforestry, horticulture, organic farming etc) should add economic opportunities to the farming sector and rural Ireland, while also reducing exposure to volatile international markets for commodities. A post COVID world would ideally look smaller with regional independence for food systems, not only to reduce food related carbon costs e.g. travel, packaging etc but to bolster the health and resilience of communities and encourage ownership of our micro-environments.

The EAT–Lancet Commission is one of the first attempts to summarise and communicate the best available science on what constitutes a healthy diet within environmental targets. Reducing highly processed foods, starchy vegetables and red and processed meat while increasing fruit and vegetable consumption would be in line with other existing guidance on healthy diets e.g., the 2021 European Society of Cardiology guidelines recommend transitioning to a diet based on whole plant foods. The transition to a more diverse and sustainable food system should be seen as a boon from a healthcare point of view, as it represents a rare triple win; better for the patient, the planet and the economy.

Rewilding

The concept of ‘rewilding’ evokes a variety of responses from people, from critical terms such as ‘land abandonment’ to romantic notions of large swathes of untouched wilderness. In reality it is neither of these things; in essence it simply means to restore an area of land to its natural uncultivated state. As discussed in the introduction, it is now universally recognised that the intensive cultivation of land that we practice has disastrous effects for biodiversity, water quality and soil health. Unfortunately, whilst these things are absolutely essential for our survival, they are deemed ‘externalities’ in our current economic system and therefore not captured or valued.

This is beginning to change, and as the CAP’s new objectives highlight, specific focus is being put on the need to make farming sustainable and to restore our ecosystems. Objective f is to ‘contribute to halting and reversing biodiversity loss, enhance ecosystem services and preserve habitats and landscapes’. One of the most effective ways of achieving this is through the rewilding of land.

Not only has rewilding been proven to rapidly increase biodiversity (Egoh et al 2021), studies have shown that landscape-scale restoration or rewilding of agricultural land can potentially increase the contribution of farmland to economic development and employment, by increasing flows of multiple ecosystem services to the many economic sectors that depend on them. Indeed, restoration has contributed to the economy in many parts of the world leading to the framing of the term “restoration economy” or “green economy” which is now commonly used in the restoration literature (Newton et al 2021). In addition it has been calculated that natural climate solutions can provide a significant proportion of cost-effective CO2 mitigation needed, and that natural climate solutions like rewilding, if effectively implemented, also offer water filtration, flood buffering, soil health, biodiversity habitat, and enhanced climate resilience (Griscom et al 2017).

Afforestation with native Irish broadleaf

As noted in the introduction, Ireland has the lowest percentage of forested land in the EU, at just 11%. To compound this failing, over 50% of trees are just one non-native Conifer species, the Sitka spruce, with just 20.5% of forested land in Ireland being broadleaved forest. Since 81% of the forests afforested since 1980 have been planted by farmers (Forest Statistics Ireland, 2020), it is clear that they play an absolutely crucial role in afforestation. Sadly, as the below graphic demonstrates, the current subsidy regime results in the vast majority of trees being planted under GP3 (Sitka spruce and others).

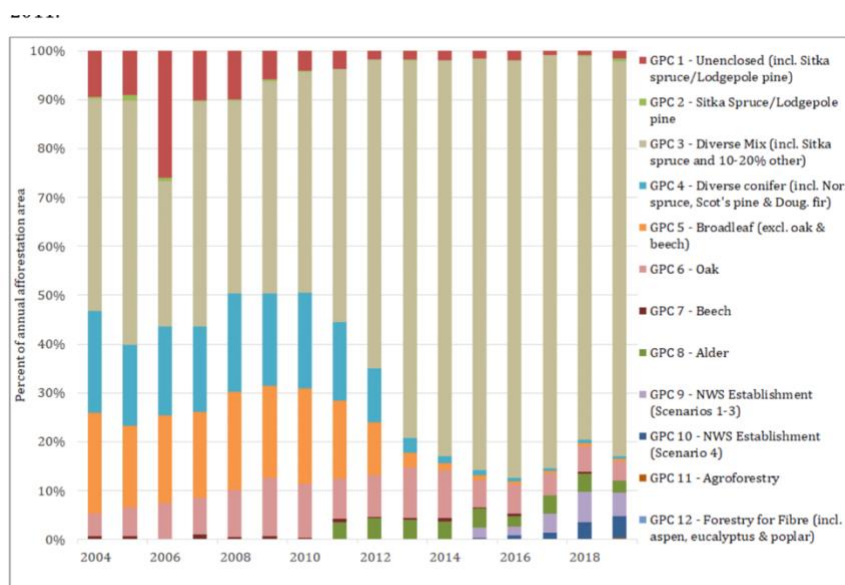


Figure 10. Proportion of annual grant-aided afforestation area by Grant Premium Categories (2004 to 2019).

A well planned broadleaf or mixed broadleaf/conifer forest provides greater habitat and hence species diversity than a mainly coniferous forest and will be more natural looking in the landscape (Teagasc 2019), and should thus be prioritised in the subsidy regime. Furthermore, continuous cover forestry, a management practice common in continental Europe has exciting additional benefits for both biodiversity and farmers, and should be

actively encouraged. It is promising to see some Coilte managed areas such as the Ticknock in Dublin transition from clear fell to continuous cover forestry of native broadleaf trees, recognising the increased value to both nature and society that these practices provide.

Protein Aid Scheme

With the current protein aid scheme, which supports farmers to grow plant proteins such as beans, peas and lupins, the maximum allowable payment for farmers is €250 per hectare. This is completely insufficient to incentivise the shift to sustainable plant protein crops. The lack of financial support available to Irish farmers to help them shift to sustainable practices or to diversify into producing more sustainable produce such as fruit, vegetables and legumes is a huge barrier to sustainable economic development and of environmental concern. The financial supports for Irish farmers to produce edible crops is insufficient compared to the support for livestock farming, with the average income of dairy farmers being €1,118/ha with an average annual increase, and the annual income of Irish tillage farmers currently standing at €556/ha and is declining (Teagasc 2020). According to the CSO, in 2017 alone, Ireland imported over 72,000 tonnes of potatoes, 47,000 tonnes of onions, 29,000 tonnes of tomatoes, 23,000 tonnes of cabbage and 15,000 tonnes of lettuce, despite having suitable growing conditions here in Ireland (CSO, Ireland's Trade in Goods 2017 2017). With system reform, this produce could be grown by Irish farmers to provide them with an income and create a self-sufficient, reliable supply chain which can contribute to Irish food security which prioritises home-grown produce.

Due to Ireland's high focus and proportion of livestock production for the beef and dairy industry, our agricultural system is highly dependent on feed imports, as we import up to 5.1 million tonnes of animal feed materials annually, particularly soy-based feed from Brazil or Argentina. This is a significant expense for the sector, while it is also contributing to additional environmental degradation and hidden GHG emissions of the livestock sector. While soybean production isn't currently possible in Ireland, supporting Irish farmers to transition to sustainable farming of other protein crops can help in the shift to a sustainable agricultural system and reduce demand for imported soy feed for the livestock sector. While the Protein Aid Scheme was introduced in 2015 which can encourage farmers to grow beans, peas and lupins, the subsequent income of €215 per hectare is insufficient for a successful large scale transition which is necessary in order to increase the proportion of plant-based farming in Ireland and to replace imported livestock feed with local protein sources.

Reforming our agricultural system and subsidy schemes to prioritize home-grown crops and reduce our dependence on livestock farming can result in increased productivity on Irish farms, help to improve the income of family farms, contribute to economic gains and aid in the development of a sustainable agricultural system which will allow a reduced herd size and reduced dependency on imported livestock feed. Furthermore, there are significant climate and health co-benefits from shifting to more plant-based food production and

consumption that may reduce societal healthcare costs and reduce climate impact costs, resulting in economic savings which can be beneficial to economic growth.

This protein aid scheme which focuses on the increased production of plant-proteins should also be coupled with an increase in public education and consumer awareness of sustainable, healthy food and dietary practices which promote the consumption of plant-proteins such as beans, peas, and legumes. Even with the improved technological advancements and productivity improvements in the livestock sector which is listed in the Ag-Climatise report, research has shown that a sufficient reduction in greenhouse gasses to keep global temperature rise below the 2 degree threshold will not be possible without also promoting structural changes in the human diet which promotes an increased consumption of plant proteins, and a reduced consumer dependency on animal products from ruminant livestock (Hedenus, Fredrik and Wirsenius 2014). Research has concluded that reforming policies regarding consumer nutritional education is a vital strategy when it comes to creating a system of sustainable food production and achieving an agricultural system which is aligned with the necessary climate action (Nicholson 1995).

Conclusion

Not only is the current Irish agricultural system unsustainably prioritised on livestock farming which is generally unsupportive of Irish family farms, but it is also our primary contributor to climate change and negatively impacting human health. It is critical to work towards sustainable development of the Irish agricultural food system as it continues to expand, in order to reduce the environmental impact and contribution to the climate crisis, which is the largest threat to global health in the 21st century (Watts and Amann 2018). In order for the Irish agricultural system to reach acceptable emission levels of greenhouse gasses and reduce its significant contribution to the climate crisis, a radical reform of food production priorities, food promotion, land use trends, financial supports, economic incentives to farmers, and government subsidy schemes will be necessary to transform to a sustainable, carbon neutral agricultural system.

Recommendations

1. The CAP strategy should align with overriding EU strategies (biodiversity and farm to fork) which aim for at least 25% organic farming, including strong monitoring mechanisms
2. Adherence to the EU Biodiversity Strategy and Food Vision 2030 goal of a 10% high diversity space for nature (non-productive areas), by increasing the current minimum of 4% to 10%
3. Inclusion of equivalent payments for land rewilding as active farming, up to a total of 100% of a farmers available land

4. Increase the minimum percentage of broadleaf in new planting projects from the current 15% to at least 25%
5. Increase the financial incentives of GPC 4-8 to encourage their uptake amongst land owners
6. Reform the subsidy payment system to ensure that a farmer receives equivalent or higher payments for tillage farming than for beef or dairy farming, and financially support the shift to non-livestock farming and carbon sequestration.
7. Provide easy to access, evidence based education for farmers on the importance of biodiversity protection, habitat restoration and ecosystem services
8. Reform the protein aid scheme in order to incentivise a rapid increase in participation in the production of plant proteins by Irish farmers. This reform of the Protein Aid scheme should include an increase in the financial rewards to farmers who opt to grow plant proteins for both human and animal consumption such as beans, peas, legumes, so that it matches or exceeds the financial supports to beef and dairy farmers.
9. Reform of the current funded dietary and food promotions. Emphasis should be made to focus on an increase in funded promotions on home-grown fruits, vegetables, wholegrains and legumes to Irish consumers (currently 11% of CAP funded food promotions), and focus on rapid reduction in funded promotions of beef and dairy produce to Irish consumers (currently 78% of CAP funded promotions).
10. Increase in public education and consumer awareness of sustainable, healthy food and dietary practices. This should include an reevaluation of the national dietary guidelines to include an increased awareness and dietary promotion of plant produce (fruit, vegetable, wholegrains, legumes, unsalted nuts and seeds) and a reduced dietary promotion of animal produce, particularly when it comes to ruminant meat and dairy.

Yours sincerely,

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On behalf of



IRISH DOCTORS FOR THE ENVIRONMENT

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References

Department of Agriculture, Food, and the Marine. 2020. *Forest Statistics Ireland 2020*. Dublin, Ireland: Department of Agriculture, Food, and the Marine.

Donnellan, Trevor, and Kevin Hanrahan. 2016. *Exploring the Implications of GHG Reduction Targets for Agriculture in the United Kingdom and Ireland*. 90th Annual Conference of the Agricultural Economics Society, University of Warwick, England, Rural Economy and Development Programme, Teagasc.

Egoh BN, Nyelele C, Holl KD, Bullock JM, Carver S, Sandom CJ (2021) Rewilding and restoring nature in a changing world. *PLoS ONE* 16(7): e0254249.

Gardi C, Jeffery S, Saltelli A. An estimate of potential threats levels to soil biodiversity in EU. *Global Change Biology*. 2013;19(5):1538-1548.

Haygarth P, Ritz K. The future of soils and land use in the UK: Soil systems for the provision of land-based ecosystem services. *Land Use Policy*. 2009;26:S187-S197.

Pcs.agriculture.gov.ie. 2021 [cited 7 December 2021]. Available from: <https://www.pcs.agriculture.gov.ie/media/pesticides/content/sud/pesticidestatistics/PPMarketStatistics2019290321.pdf>

<https://www.unep.org/news-and-stories/press-release/our-global-food-system-primary-driver-biodiversity-loss>

Hedenus, Fredrik, and Wirsenius. 2014. "An observation of reduced meat and dairy consumption for meeting stringent climate change targets." *Climate Change* 79-91

Natural climate solutions, Bronson W. Griscom, et al, *Proceedings of the National Academy of Sciences* Oct 2017, 114 (44) 11645-11650; DOI:10.1073/pnas.1710465114

Newton AC, Evans PM, Watson SC, Ridding LE, Brand S, McCracken M, et al. Ecological restoration of agricultural land can improve its contribution to economic development. *PLoS One*. 2021 Mar 5;16(3):e0247850. pmid:33667265

Nicholson, Charles. 1995. "Livestock, Deforestation, and Policy Making: Intensification of cattle production systems in Central America Revisited." *Journal of Dairy Science* 719-734.

SO. 2017. *Ireland's Trade in Goods 2017*. Cork, Ireland: Central Statistics Office.

Teagasc. 2017. *National Farm Survey (NFS)*. Carlow, Ireland: Teagasc.

Teagasc. 2020. *National Farm Survey 2019 Preliminary Results*. Teagasc.