

26.8.16

**Re: Public Consultation on the on the Statement of Strategy 2016 -2019  
for the Department of Agriculture Food and the Marine**

Dear Ms. Mulligan,

We refer to the notice on the public consultation by the Department of Agriculture Food and the Marine on its Statement of Strategy 2016-2019. We attach our views towards improving on the previous DAFM Statement of Strategy (for 2015-2017). Also linkeded is the recent Not So Green report (footnote 1) detailing scientific and expert evidence on agricultural emissions and carbon sequestration policy.

Our submission includes: responses to the questions in your email requesting consultation submissions, and suggestions for improvements to the text of the current Strategy.

Since the previous strategy was adopted there is a renewed and urgent imperative for decarbonisation and international leadership by Ireland on climate, following signature of the Paris Agreement. The Climate and Low Carbon Development Act 2015 necessarily requires action by Ireland in line with the Paris goals in accord with science and equity – a level of ambition considerably beyond the insufficient pathway described by the EU 2030 INDCs and ETS and ESD targets.

Achieving greenhouse gas emissions reduction and increasing net food production, while reducing adverse impacts on biodiversity and water bodies, should be core priorities for Irish agriculture that need to be treated as matters requiring urgent policy response. The current Statement of Strategy supports an agricultural sector with a negative net food output, very high greenhouse gas emissions, and ongoing and cumulative adverse impacts on biodiversity and water quality. This unsustainable path is being supported by large inputs of public and EU funds.

For Irish farmers and for the public good An Taisce strongly suggests DAFM directs a revised Strategy to support Irish agriculture's transition toward a far more sustainable path.

Yours sincerely,



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Philip Kearney,  
Chair, Climate Change Committee

**An Taisce's Response  
to the Public Consultation on the Statement of Strategy 2016 -2019  
for the Department of Agriculture Food and the Marine  
August 2016**

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## 1 Executive Summary

Meeting the goals of the Paris Agreement on climate action and assuring future global food security implies Ireland needs to achieve sustained reductions in absolute, sectoral greenhouse gas (GHG) emissions as well as increasing net food production. Effects on biodiversity and water, and social sustainability for farmers, rural economy and the long-term public good also need to be addressed.

Although the current Statement of Strategy mentions all of these objectives it presents an entirely incoherent strategy that is wholly insufficient to meet them as has already been shown. An Taisce recommends a profound change in direction away from current policies.

By prioritising a business-as-usual model of livestock-dominated production for export, the current Strategy in fact supports sectoral emission increases, perpetuates a food-production system that reduces global food security, continues large annual and cumulative adverse impacts on the environment and contributes to insecurity for many farmers. Inefficient food production based on large-scale meat and dairy for export is neither climate-smart nor food smart. The situation is the same in the EU as a whole, an unsustainable path being sustained by large inputs of public funds.

As the recent Environmental Pillar and Stop Climate Chaos report, *'Not So Green: Debunking the Myths around Irish Agriculture'*<sup>1</sup> shows through using extensive peer-reviewed references, the “green reputation” of Ireland’s agriculture is not backed up by scientific evidence. Ireland’s beef and dairy production is in fact less efficient than the EU average. Severe past adverse impacts on biodiversity and water quality mean they are in a seriously degraded condition due to the ongoing and cumulative impacts of Irish farming. Peatlands across Ireland need rewetting and preservation. Forestry expansion and the increased use of biomass for energy are being pushed by current strategy as climate mitigation but both policies are scientifically flawed.

For the security of Irish farmers and for the public good, An Taisce strongly suggests DAFM reorient the new Strategy toward a far more sustainable path.

Even meeting the proposed new Effort-Sharing Decision (ESD), a target itself far short of Paris Agreement ambition, will mean achieving substantial reductions in GHG emissions by 2030 especially in agriculture and transport. The sustainable course is to re-direct financial supports and research time away from livestock and toward mixed farming, which would be climate smart, increase efficiency and net production of food, benefit food security and increase employment potential. Boosting biodiversity and lowering environmental impacts would also have huge co-benefits in reduced health costs and benefits for food production. By reducing

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<sup>1</sup> [http://www.stopclimatechaos.ie/download/pdf/not\\_so\\_green.pdf](http://www.stopclimatechaos.ie/download/pdf/not_so_green.pdf)

imports of animal feed the EU can decrease global deforestation and add to food security.

The Department's declared mission of leading future national and global sustainable development requires feeding more people while cutting emissions, minimising impacts and securing farming futures. It is possible but not under current policies. Therefore a transformation in the Departmental Strategy is required to balance the apparent leaning toward short-term, industry preferences with the over-riding mission of impartial decision-making for the long-term public good of Ireland and the world in line with our international obligations for real sustainability.

## 2 Mission Statement

An Taisce believes the current SoS Mission statement is entirely inadequate in its phrasing and needs to be redrafted. It needs changes in line with actually achieving the objectives already stated in the SoS (in strategic actions 3.1 to 3.7), i.e. a coherent and effective response to the twin challenges of food security and climate change from environmentally and socially sustainable agriculture and fisheries.

The current Mission reads:

**“To lead the sustainable development of the agrifood, forestry and marine sector and to optimise its contribution to national economic development and the natural environment”**

This is a largely meaningless statement unless the meaning of “sustainable development” and “optimising its contribution” are clearly spelled out. The most frequently referenced definition of sustainable development comes from the Brundtland Report which makes it clear that “the goals of economic and social development must be defined in terms of sustainability in all countries” in meeting “a threatened future”:

Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs. It contains within it two key concepts:

- the concept of 'needs,' in particular the essential needs of the world's poor, to which overriding priority should be given; and
- the idea of limitations imposed by the state of technology and social organisation on the environment's ability to meet present and future needs<sup>2</sup>.

The current Mission is phrased only in terms of the agrifood, forestry and marine sector and can too easily be read as aiming only to sustain and develop the profits and businesses of existing food producers. Similarly, optimising the sector's contribution to the natural environment could just mean doing only what is cost-effective to protect biodiversity and water rather than doing what is necessary.

Ireland currently imports more food in calorie terms than it exports detracting from global food security rather than adding to it. This is because of the well-known, but too often ignored fact that large-scale meat and dairy production is inherently inefficient as a way to produce food because it takes in large amounts of feed produced on land that could produce far more calories and protein if it was producing crops directly for human food. Animal feed imports are also contributing to global deforestation.

Section 2 in the present SoS identifies ‘opportunities’ under the current Mission that

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<sup>2</sup> [UN World Commission of Environment and Development](#) (1987)

are in fact contrary to sustainable development.

The increasing global demand for meat and dairy is identified as an opportunity despite the fact that experts agree that this trend is completely unsustainable in terms of both future food security and achieving climate stabilisation both of which are critical to the normal definition of sustainable development for the long-term good of all of the world's population. The 'opportunity' identified may benefit the short-term profits of current agri-food producers in Ireland but it is in direct conflict with DAFM's stated mission.

Similarly, the 2015-2017 SoS identified the removal of milk quotas as an opportunity saying on p.7:

This will provide an historic opportunity for expansion and for innovation in the dairy sector. This will reinvigorate the sector and restore a new dynamism for growth absent since the introduction of quotas in 1984. Irish dairy production has the potential for expansion primarily because of the competitive position of Irish dairy production relative to competitor countries.

Many farmers were encouraged to take on debt to increase production and were then exposed to the full force of international competition. Unsurprisingly, milk prices dropped as the supply increased, benefiting dairy product and milk powder producers but negatively affecting many farmers. As a result yet more public money has been spent supporting the milk price and farmers in difficulty. All this was widely expected except by the Strategy. The resulting price decreases undermined the SoS's declared value of promoting socially sustainable farming and the rural economy.

A third key opportunity identified in SoS 2015-17 is "Building on Ireland's green reputation":

There are opportunities to take advantage of Ireland's Green Reputation in terms of image and branding, but sustainability claims must be substantiated with scientific evidence. Also there are opportunities for improvement to capitalise further on low emissions and the level of carbon efficiency of Irish production systems.

However, in reality the green reputation being heavily pushed by Bord Bia in its Origin Green public relations programme is making claims implying overall sustainability that are very far from being substantiated with scientific evidence. In Not So Green, the recent Environmental Pillar / Stop Climate Chaos report, extensive scientific and expert evidence is provided rebutting the myths being perpetuated<sup>3</sup>. As detailed in the report, large-scale ruminant production – beef in particular – is inherently a highly inefficient way of producing food (using up more or displacing more human food than it produces). As also detailed in the report, Irish beef and dairy production is in fact on average less efficient than the EU average. Again the opportunity identified in the SoS is opposite to the mission, being against sustainable

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<sup>3</sup> Environmental Pillar/Stop Climate Chaos (2016) Not So Green: Debunking the Myths around Irish Agriculture.

development, and also, optimally realising competition in the EU on the basis of efficiency would in fact take production away from most dairy producers in Ireland.

In the same section a threat to the “operating environment” is identified as:

There are environmental threats in terms of limiting emissions, attaining targets for renewable energy and the effects of climate change on the environment and on production systems.

DAFM should note that the environmental, climate change threat is not from ‘limiting emissions’ it is from continuing high levels of emissions. As we know one of the main sources of Irish emissions adding to global warming are the potent GHGs methane and nitrous oxide from agriculture (one third of total national emissions and over 44% of the ESD sector). Sustained reductions in total annual agricultural emissions would allow the sector to reduce adverse climate change impacts on the future operating environment of both Ireland and the rest of the world. Some regions of the world such as parts of Africa, are already experiencing adverse climate change impacts due, in part, to Ireland’s agricultural emissions.

Another threat noted is that:

Global economic uncertainty could impact negatively as agriculture is reliant on exports.

Irish agriculture is reliant on exports in large part because past and present policy has not created a resilient farming industry that can also depend on domestic food consumption of Irish-produced food. At present a very large proportion of the food consumed in Ireland is not produced in Ireland.

Given the potential for serious misinterpretation and the recent strategic errors in regard to the present Mission, An Taisce suggests that it be changed to something of the following form:

**“To achieve sustained increases in net food production and sustained decreases in absolute emissions from the agrifood, forestry and marine sector, while increasing its contribution to national well-being, promoting healthy diets and steadily reversing past adverse effects on the natural environment.”**

### 3 Values

In particular, developing the new SoS should consider deeply just how well the current DAFM procedures deliver on the Values requirement for “A deep-rooted public service ethos of independence, integrity, impartiality, equality, fairness and respect”. In An Taisce’s view the Department has not delivered on these values, as is evidenced in the biased delivery and content of policy which repeatedly defers to existing agri-food producer and large land-owner preferences.

A striking example of this is obvious in the current SoS, p.6, which states:

*'Food Harvest 2020 sets out a cohesive roadmap for the agrifood industry to build capacity, adapt to challenges and grow in the context of emerging opportunities in the decade to 2020. The fact that this is an agreed plan from the major stakeholders in the agrifood industry is in itself a major strength.'*

That the agreed plan was from “major stakeholders in the agrifood industry” should not be considered a major strength, rather it should be treated with the independence, integrity, impartiality that DAFM are obligated to ensure on behalf of the public so that the public interest is also safe-guarded, most especially as the very long-term mission of sustainable development for future generations as well as our own is being respected.

Likewise, the development of Food Wise 2025 was again directed by industry interests, with minimal oversight invited from the Oireachtas, the EPA or from the environmental NGO sector. No Strategic Environmental Assessment was even carried out for Food Harvest 2020 and, as An Taisce and others pointed out, the SEA for Food Wise 2025 was entirely inadequate<sup>4</sup>, yet minimal changes were made. Moreover neither the media nor NGOs seem to have been formally notified of the final SEA release such that reporting or complaints could not be made in a timely manner. Again it appears that industry preferences are favoured over principles of integrity, impartiality, effectiveness, equity and accountability.

In the request for submissions for the new SoS the first question reads, “How well do DAFM services meet the needs of agri-food/marine sector (What are we doing well and what could we do better)?” The needs of the sector are seemingly DAFM’s predominant concern above achievement of an excellent service for the public as a whole<sup>5</sup>.

Given that Bord Bia and Teagasc both operate under the remit of the Department – Teagasc with considerable direct industry funding – such a bias, whether real or only apparent, cannot be said to be fulfilling the primary civil service obligation on DAFM to act for the current and future public good of Ireland. It may well be that funding pressures on the Department, reducing staff numbers and decreasing the potential for sufficient oversight, create the conditions favouring industry preferences but the public good still needs to come first.

## 4 Metrics

The consultation submission request asks, “What metrics should the department use to measure our performance and monitor achievement of our strategic goals?” An Taisce is concerned by the confusing use of metrics by DAFM and Teagasc and of arguments for continued unsustainability based on false premises.

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<sup>4</sup> An Taisce (2015) Submission on the Food Wise 2025 SEA

<sup>5</sup> DoF, Standards in Public Office Commission (2004) Civil Service Code.

“The mission of the Civil Service is the achievement of an excellent service for Government and the other institutions of State as well as for the public as citizens and users of public services, based on principles of integrity, impartiality, effectiveness, equity and accountability.”

For climate change mitigation in the agriculture sector the essential metric is total annual sectoral emissions as reported by the EPA to the UNFCCC. Ireland's current policy of maintaining the existing beef herd while expanding the dairy herd by 30% to 2020 is projected to increase emissions and keep them at around the current very high levels. In other words no climate mitigation whatsoever will be achieved by the Irish agricultural sector under the current Strategy and policies.

The GHG intensity metric (GHG emissions per unit of meat or dairy produced), frequently referred to by DAFM and Teagasc, is irrelevant to meeting climate change targets if sufficient reductions in total emissions are not achieved. Multiplying the GHG intensity of any agricultural product by the total number of production units per year in Ireland gives the full carbon footprint of total emissions for that product. An Taisce and the Environmental Pillar have made it clear to DAFM and Teagasc that it is not acceptable to use the carbon footprint of one litre of milk or one kilogram of beef as the key metric for calculating the carbon footprint of the entire production of milk or beef in Ireland. They are not the same thing and this improper and confusing use of metrics should stop.

Irish pastured cows might be happier than their sister cows in intensive indoor livestock systems elsewhere in Europe. So on the happiness index An Taisce is inclined to agree that extensively pastured Irish dairy and beef performs well. But on the GHG efficiency index Irish agriculture is quite poor. According to standard GHG accounting Irish beef and milk is actually less efficient than the EU average. Simply look up the GHG emissions of the national dairy herds, and divide by dairy production and this is evident. Likewise for beef. No complex analysis is required. It is disingenuous and misleading for DAFM and Teagasc to say otherwise.

The methodology and data presented in the Joint Research Centre (JRC) report, often referred to by DAFM and Teagasc, does not comply with EU GHG accountancy rules and is of no relevance for compliance with our 2020 or 2030 targets. Its methodology is also highly questionable. It assumes that the "natural" state of all agricultural land is grassland. Thus cropland is assigned a notional imaginary GHG emission equal to the foregone carbon sequestration of natural grassland. Accordingly intensive dairy/beef, which rely on cropland for animal feeds are assigned a high GHG emission. But this is not an actual physical emission as we would understand it. In terms of physical direct emissions grass-fed dairy and beef is definitely less efficient.

However, production efficiency is not everything so metrics assessing aspects other than efficiency are therefore also important. Cattle (though not sheep) can be an important part of High Nature Value farming with increased biodiversity that conserves species particular to grazed pasture. Intensive (industrial) livestock agriculture is more GHG efficient per unit product than extensive farming but it often comes with huge problems: high total emissions from raised production; high amounts of localised pollution; extreme adverse effects on animal welfare; and dangers to human health from pollution, animal medication and providing potential focal sites for infection spread. The euphemism 'sustainable intensification' is often used to divert attention from these complications and should be avoided.

## 5 Climate Action Arguments Require Correct Premises

The IPCC says: “*Limiting climate change requires substantial and sustained reductions in greenhouse gas emissions.*” Therefore mitigation must ensure that emissions of long-lived, cumulative climate pollutants such as carbon dioxide and nitrous oxide must go to zero and flows of short-lived climate pollutants and pollutant precursors such as methane, black carbon and ammonia need to be greatly reduced to achieve climate action. Global warming responds to total emissions not to our efficiency or production preferences.

Most importantly, to count as mitigation, permanent reductions in flows of short-lived climate pollutants like methane need to be achieved and guarantees are needed that stocks of cumulative climate pollutants such as fossil fuel carbon will never be released. This means that any and all climate action only counts as mitigation if it occurs within a system of governance that can deliver on these requirements to achieve a stated, politically agreed temperature target.

The temperature target agreed at Paris in Article 2 of the Agreement aims at:

*‘Holding the increase in the global average temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognising that this would significantly reduce the risks and impacts of climate change;’*

The EU’s defined contribution, a 40% cut in domestic emissions by 2030 falls far short of what is needed to meet this goal. The recent EU 2030 Effort Sharing Decision also fails to follow the rates of urgent decarbonisation needed for even a 2°C pathway, especially for a wealthy bloc with high per capita emissions with both the capacity and responsibility to act.

Nonetheless, if the Irish Government and government departments are serious about meeting even the ESD target then the aggregate sector of transport, agriculture and other non-traded emissions will need to steadily reduce emissions over time. Within this sector the efficiency or otherwise of Irish agriculture relative to other nations is irrelevant. If the target is to be met then transport and agriculture will have to reduce emissions in line with meeting the overall target pathway, or else they will need to pay another sector within the aggregate sector (such as building retrofit) to reduce the emissions cost effectively based on whatever rules are established by the Irish government under the National Mitigation Plan. Logically a market in emissions has been created for the ESD sector.

Emission fees or regulation must similarly also affect imports for climate governance to be effective. Import border tariffs or restrictions based on emissions should be required to prevent leakage. However, objecting to restrictions on the basis of leakage (as is stated in the DAFM mitigation document) is nonsensical if effective controls on imports are proposed on the same basis as on domestic production. Consumers are the ultimate causers of climate pollution so it is right that the climate

pollution produced by high-carbon luxury foods such as beef should pay for the pollution that results from their consumption.

Forestry is improperly being described by DAFM and Teagasc as a climate mitigation measure that can offset livestock agriculture emissions in an indirect way by absorbing CO<sub>2</sub> emissions from fossil fuel burning. However, climate science is very clear (see IPCC AR5 WG1 Ch. 6) that land-based sinks for carbon sequestration – forests, pastures, soils – are neither permanent enough nor certain enough to qualify as offsets against the highly permanent accumulation of future fossil fuel CO<sub>2</sub> emissions. Unless urgent and deep CO<sub>2</sub> emissions in line with the Paris Agreement goals are being undertaken (which they are not), then in the conclusion of Mackey et al, 2013:

*'considering carbon storage on land as a means to 'offset' CO<sub>2</sub> emissions from burning fossil fuels (an idea with wide currency) is scientifically flawed. The capacity of terrestrial ecosystems to store carbon is finite and the current sequestration potential primarily reflects depletion due to past land use. Avoiding emissions from land carbon stocks and refilling depleted stocks reduces atmospheric CO<sub>2</sub> concentration, but the maximum amount of this reduction is equivalent to only a small fraction of potential fossil fuel emissions.'*<sup>6</sup>

Similarly, all bioenergy from forestry production and imported wood pellets has been incorrectly accounted (according to current EU rules) as carbon neutral and contributing to climate mitigation. Strict sustainability criteria and rigorous scientific carbon accounting must be applied to Irish forestry and bioenergy moving forward. Emissions resulting from burning of biomass should be fully accounted for when calculating the climate mitigation potential of biomass.

Following the strong science against the false accounting, the EU Court of Auditors has recently found that the EU should adopt detailed lifecycle accounting and strict criteria. In the face of the science, a major DECC report and this finding by the EU, developing bioenergy and extensive coniferous forestry on the basis of the current, scientifically flawed accounting is likely to be highly risky economically as well as adding to rather than reducing climate pollution.

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<sup>6</sup> Mackey, B. et al (2013) 'Untangling the confusion around land carbon science and climate change mitigation policy'. Nature Climate Change, 3, 522.