An Taisce
The National Trust for Ireland

Agri-Food 2030 Strategy Public Consultation,
Department of Agriculture, Food and the Marine,
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Sent by email to: 2030strategy@agriculture.gov.ie

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Re: Public Consultation on Ireland's Agri-Food Strategy to 2030

An Taisce welcome the opportunity to comment on the consultation for Ireland's Agri-Food Strategy to 2030. We would like to raise the following points.

Overview of Irish Agriculture

The current model of agriculture in Ireland is broken, farmers are involved in loss-making activities, with many farm incomes largely provided through CAP payments. The farming model is hugely dependent on unsustainable fertiliser and feed imports, with mechanisms such as the nitrates derogation accommodating unsustainable intensification, while facilitating increased environmental pollution. We are in a biodiversity and climate emergency. Almost 50% of our freshwaters are polluted. Farmland bird populations are collapsing, along with pollinator numbers. Rural depopulation and an aging farming cohort is increasingly undermining rural communities, with farming supports such as TAMS leading to increased investment in machinery which further promotes unsustainable intensification

and farmer indebtedness. We are a net importer of food energy, and our import-export agricultural model is extremely vulnerable to international market aberrations. Monocultures are favoured, leaving us open to pests and disease and climate change impacts.

Despite this, given the locked-in regime that currently governs agri-strategy in Ireland, An Taisce has concerns that this consultation will fail to acknowledge the failure of its agri-strategies to date. Indeed, in a recent Farming Independent article Minister Creed outlined his ambition to further expand the intensive agriculture sector, thereby prejudicing this public consultation. If the Minister's comments were accurately reported, it is a clear indication that this consultation is nothing more than a tick box exercise. This is extremely concerning in a time when we are facing such serious ecological and climate breakdown.

Anything other than a radical shift in focus in the next agri-food strategy to domestic food security within a system of enforced limits on absolute annual and cumulative pollution will be environmentally unjustifiable. In an era of runaway climate and ecosystem breakdown, any anthropogenic practice at a large scale that cannot be justified on economic, environmental or ecological grounds must be questioned.

Question 1. How important has Food Wise 2025 and previous strategies been in providing strategic direction for the agri-food sector? How do you think it could be improved in the new strategy?

The introduction to this consultation outlines that:

> *'Food Wise 2025 set out a vision of ambitious but sustainable growth for the sector over the next decade, with key cross cutting themes of improving sustainability, developing human capital, and promoting innovation, competitiveness and market development'*

Food Wise 2025 (FW2025) has been instrumental in terms of driving the economic direction for the agri-food sector, and the resultant dramatic expansion in the dairy industry, much to the detriment of environmental protection. It has not been successful in achieving any form of sustainability.

Food Harvest 2020 (FH2020) and FW2025 were industry-developed strategies, largely driven by agri-food processors and large landowners, with what would appear to have been little input from DAFM and the Government at large. Further, the involvement of smaller farmers and civil society was minimal. The implementation of these industry-driven strategies has been overwhelmingly focused on delivering increased profits to processors and larger land owners, while transferring increased financial risks onto farmers with limited benefit to rural

society. The resulting model has locked Ireland into an increasingly unsustainable pathway heavily reliant on increased inputs of imported fertiliser and feed. As such, the social outcomes of these policies should be critiqued in light of this. Who is ultimately benefiting from this approach?

In direct contrast to the economic successes of these programmes, the environmental damage as a result of this farming approach is beyond question. FH2020 and FW2025 have overseen the ongoing decrease in water quality, with the EPA highlighting in the 2016 State of the Environment report[1] that there is a clear correlation between the areas with the highest nitrate and phosphorus concentrations in waters and areas with the most intensive agriculture (in addition to high human density). The data gathered by the EPA are beyond dispute, 53% of river pollution is attributable to agriculture.

Further, biodiversity continues to decline. And the recent Article 17 report authored by the NPWS on our European protected habitats highlighted over 70% of our protected habitats are impacted by agricultural pressures, and this pressure was ranked of high importance in more than 50% of habitats.

Nitrogen pollution in the form of ammonia (NH_3) is almost entirely attributable to agriculture, and poses a serious risk to global biodiversity, leading to species decline via eutrophication, acidification and direct toxicity to a range of habitat types (Kelleghan et al (2019[2]) and references therein). Indeed, the most recent Article 17 report highlighted that agricultural generated air pollution is a particular threat for blanket bog, alpine heath and wet heath, all of which are currently in bad status.

Meanwhile Ireland's GHG emissions also continue to rise, with emissions from agriculture up 2.9% in 2017, and 8.9% since 2010 (when Harvest 2020 was published)[3].

While FW2025 would appear to many to be an economic success, the very real costs, both social and environmental, have not been adequately enumerated, with inadequate enforcement of environmental regulation and disregard of climate action. Significant increases in inputs such as fodder and fertiliser have been allowed because the pollution costs of waste are minimal. The focus continues to be on efficiency measures and on monetising waste, both of which will have the consequence of increasing production and

[1] EPA (2016) Ireland's Environment 2016 - An Assessment

[2] David B. Kelleghan, Enda T. Hayes, Mark Everard, Thomas P. Curran (2019) Mapping ammonia risk on sensitive habitats in Ireland. Science of The Total Environment, Volume 649, 1580-1589.

[3] EPA (2019) Ireland's Final Greenhouse Gas emissions 1990-2017

increasing total environmental pollution loading as market demand is currently the only effective limit imposed.

Environmentally sustainable farming is not an add-on to a strategy, the whole strategy should be framed by this. As outlined by multiple reports, the current current agricultural model, if unchecked, will ultimately lead to biodiversity collapse and climate breakdown within the foreseeable future. It is not so much that the next strategy needs to be improved, it is more that it needs to facilitate a radical overhaul in thinking and approach.

As the DCHG recently outlined[4]:

> `*It is unclear if the greater consideration being given to sustainability and biodiversity in sectoral policy is sufficient to turn around the continuing degradation of habitat and species populations, and the threats to key ecosystem services'*

And in specific reference to FW2025

> *'Although in principle, the strategy contains safeguards for biodiversity, water quality and carbon emissions, it is often unclear what how these will be applied at producer level'*

A useful starting point would be enforcing limits on absolute annual and cumulative pollution drivers and pollution, decreasing each over time, in order to make any progress towards achieving sustainability.

Question 2. Do you think that the five cross-cutting themes (environmental sustainability, human capital, competitiveness, innovation and market development) should continue to feature in the next strategy? Are there alternative approaches or themes that you would suggest?

We strongly advise that these "themes" be treated as a hierarchy with environmental sustainability as the critical foundation for social and economic development. As clearly outlined by the DCHG[5]:

> *'biodiversity is central to soil productivity, pollination, pest predation, water retention, clean water provision and the maintenance of commercial fisheries. In each of these*

[4] DCHG (2019) Ireland's 6th National Report to the Convention on Biological Diversity. Department of Culture, Heritage and the Gaeltacht.
[5] DCHG (2019) Ireland's 6th National Report to the Convention on Biological Diversity. Department of Culture, Heritage and the Gaeltacht.

areas there is an opportunity to realise market premia and transfer greater value added to those who manage their production using methods that protect natural capital.'

Any future agri-food strategy must make environmental sustainability its central tenet, in order to ensure the achievement of the reversal of biodiversity loss, climate action aligned with the Paris Agreement, and the safeguarding of air, water and soil quality. The fundamental survival of our agricultural and food production system depends on these functioning as they should, and the restructuring of our agri-food system to reward sustainable production should be a key feature in any new strategy. In that regard FH2020 and FW2025 should be viewed as case studies in how not to design an environmentally sustainable agri-food strategy.

Question 3. What do you think should be the absolute priority for the agri-food sector strategy to 2030?

The immediate priority for Ireland's agri-food sector strategy to 2030 should be imposing strict limits on the import and usage of nitrogen fertiliser and feed. At a minimum, since 2011 represented a major turning point from declining to increasing N use in Ireland, and from decreasing to increasing agri emissions, the import of N-fertiliser and animal feed should be urgently reduced to the 2011 level, with a future plan for a slow, sustained further reduction from those levels.

These inputs are the primary drivers of the recent growth of Ireland's intensive agricultural model. Ireland's increasing dairy herd requires large amounts of grass, fodder and imported feed to sustain itself. This is generally provided by growing perennial rye grass, and the large volume of grass produced largely depends on the use of synthetic fertiliser, generally applied twice per year. Without this fertiliser the same number of cattle could not be sustained on the land. As such, the increased use of synthetic fertiliser underpins the recent rapid and unsustainable expansion of the dairy herd, in addition to imported feed.

Limiting nitrogen fertiliser and feed would ensure that the kind of efficiencies detailed by Teagasc's 2012 and 2019 GHG abatement studies would actually result in real reductions in absolute climate and environmental impact. Agricultural carbon emissions have risen by 9% (1.7Mt CO2 eq) since 2010 (when FH2020 was published). These emission increases are a consequence of the unsustainable agri-food outputs targets under previous agri-food policies, which failed to consider the damaging impact of increased inputs, namely artificial chemical fertiliser and feed.

Synthetic chemical nitrogen fertiliser is a key driver of methane, ammonia and nitrate pollution with knock on climate change, air quality and water pollution impacts, and biodiversity loss. Reducing the inputs of synthetic fertiliser would be a valid starting point from which to redress the ecological and environmental damage which resulted from previous agri-food strategies.

Question 4. Do you agree that these are the most important challenges and emerging trends for Irish agri-food in the period to 2030? Are there others that should be considered?

Above all else, biodiversity loss and climate breakdown are the biggest challenges, not just for Irish agriculture, but for every country, every industry, and the global community. It is the challenge of our generation, and the compromised inheritance of the next. As outlined in our answer to question 2, agriculture depends entirely upon a healthy ecosystem, and a predictable climate, both of which are being undermined by current intensive agricultural practices.

Ecosystem collapse is a real and tangible threat, with identified specific threats for agriculture in regard to increased pest infestations and loss of pollinators, among many others. If the next agri-food strategy does not acknowledge the biological and climatic constraints within which it functions, and adjust its approach accordingly, it will fail on all fronts: economic, environmental and social. The next agri-food strategy must address these issues in the first instance, all the others which are listed are secondary. The current unsustainable agricultural system is proving to be an exercise in diminishing returns for smaller farmers, and this should be rectified at a fundamental ecological level, with the necessary market supports.

Climate targets and environmental sustainability (reversing biodiversity losses and reducing pollution loads) need to be the primary focus for Irish agriculture. The uninterrupted degradation of Irish soils and water bodies, together with the diminution of native biodiversity, must be stopped.

Question 5. What do you think could be done to improve resilience to risks across the sector, from 'farm to fork'?

Reversing the meat and dairy focus of FH2020 and FW2025 is now critical to reviving farm incomes in poorer rural areas, improving resilience to risks for farmers and increasing domestic food security. Climate impacts to food, fodder and feed supplies can be expected to increasingly affect farm and food supply resilience in Ireland, and around the world, in

addition to the serious complications posed by pollinator and biodiversity loss. Animal agriculture is an inherently inefficient use of agricultural land, and any new strategy needs to set out how Ireland is to grow food, not grass.

A focus on supporting a sustained transition for farmers to diversify into food crop production, agroforestry and establishing biodiverse and food productive woodland is necessary. This would reduce the usage of imported feed and synthetic fertiliser, while protecting biodiversity and preventing water pollution. Supports and subsidies need to enable farmers to focus on soil improvement for the best fields, thereby providing for highly productive horticultural and arable production for human food. Sward diversity should be increased, particularly with natural nitrogen fixing species such as legumes and clovers. If these remain in pasture they increase net nourishment per hectare, reducing the need for costly and polluting synthetic fertilisers.

Question 6. What do you think the vision for the sector to 2030 should be?

The vision should be of a resilient and self-sustaining system, which provides food security and promotes rural livelihoods, in addition to climate mitigation, biodiversity protection and improved water quality. This is in keeping with the recommendations of the Joint Oireachtas Committee on Climate Action (JOCCA) report which recommended in its March report:

> *'a need for a more diversified, resilient, sustainable and equitable model for Irish agriculture'*

The current vision of Ireland's food system is one which is predicated on our 'green' image, heavily promoted via Origin Green. However, even state agencies recognise the weaknesses in this approach. A recent quote by Teagasc in the Farming Independent[6] (April 4th 2019) set out a stark warning on the sustainability claims made for Irish food export promotion, warning that greenwashing could backfire:

> *'In (Bord Bia's) Origin Green we are making very strong claims about sustainable performance and environmental performance that is creating a need for credible demonstration of sustainability - the industry needs credible evidence rather than glamour stories.*

6 https://www.independent.ie/business/farming/agri-business/greenwashing-could-backfire-on-farming-37971831.html

If we are to continue with the sustainability claims that we are a clean, green food producing nation, we need to prove it. Other organisations outside of Ireland will be very quick to pounce on claims that we make.'

The JOCCA report also recognised that Irish agriculture has become over-reliant on emissions-intensive beef and dairy production. In the new vision Ireland needs to move away from an import based system, and recognise that we are not 'feeding the world'. This is blatantly unsubstantiated given that Ireland is a net importer of food energy (FAO Food Balance data, 2013, Figure 1). As shown in this chart, Ireland is a net importer of food energy in order to produce our exports of meat and dairy, Ireland is subtracting from global food security in a way that is clearly not sustainable.

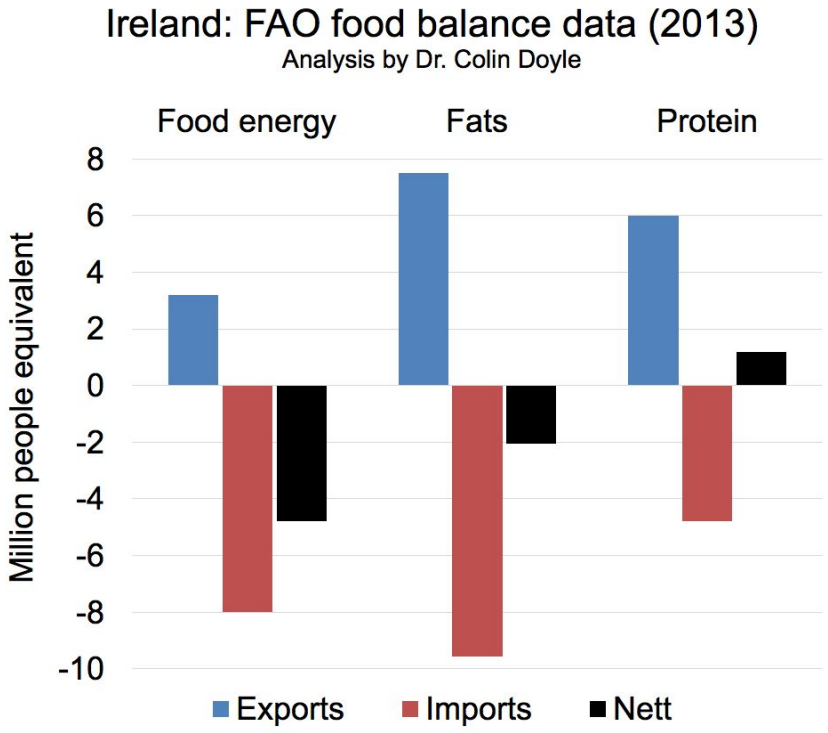


Figure 1: Ireland's FAO food balance data from 2013, from data collated by Doyle (unpublished) The net protein export is facilitated by large imports of synthetic N fertiliser)

There is a widely accepted misrepresentation of the food needs of the world, which are predicated on the perceived requirement for ever increasing volumes of milk and meat, for example in an EPA report by O'Brien and Shalloo (2019[7]):

[7] http://www.epa.ie/pubs/reports/research/climate/Research_Report_288.pdf

'world population is growing rapidly and is projected to require 58% more milk and 73% more meat by 2050 compared with 2010 consumption levels (FAO, 2011).'

Many authors disagree with this assessment, as outlined in Billen, Garnier and Lassaletta 2013[8]:

'The idea that solving the problems of our hungry planet by further intensifying agriculture in the most productive regions of the world together with developing commercial trade of agricultural products should be considered with great caution. On the contrary, the scenarios we have presented here suggest that reorganizing agro-food systems in order to better match the local food and feed demand by local agricultural production, and better use the potential of N2 -fixing crops, would not only 'feed the world', but also considerably reduce, at the source, the dissipation of reactive nitrogen into the environment.'

Ireland's vision should be on creating a localised, diverse and secure food production system, with the focus moving away from ever-growing international expansion for short term economic gain, towards maximising the potential of Ireland's agriculture to provide a vibrant, biodiverse and secure system system for the foreseeable future. This system would provide environmental dividends, and equity to farmers.

Question 7. What do you think will be the most important contribution(s) of farmers/fishermen and the food industry to Irish society in the period 2020 to 2030?

With properly targeted top-down, results-based supports, Irish farmers and fishers can contribute to establishing a localised diverse and secure food production system, with a concomitant regeneration of rural societies and livelihoods.

Question 8. What do you think would be the key words that you would wish to associate with the agriculture, fishing, forestry and food sector in 2030?

Resilience, diversity, equity, carbon-neutrality and self-sustainability. This sustainability must be true sustainability, in line with the highest environmental standards with a view to the whole life cycle analysis of agricultural impacts.

[8] https://royalsocietypublishing.org/doi/full/10.1098/rstb.2013.0123

Question 9. What can be done to improve the extent and rate of uptake of practices that improve water and air quality, mitigate greenhouse gas emissions and protect biodiversity? What are the barriers to uptake of those practices?

A key barrier to change is the high level of taxpayer subvention for large-scale animal agriculture and commercial forestry. There is a clear need for rebasing CAP payments (both at European and domestic level) away from a singular focus on dairy and beef and towards growing food which will provide multiple benefits, as outlined above.

Agricultural subsidies must represent money for public goods, with results based payments. Farmers should be financially rewarded for providing spaces for nature, protection for water quality, and reductions in emissions. The current framework does not reward positive environmental action, with environmentally destructive behaviours, such as land drainage and scrub removal, being financially incentivised. One size does not fit all when it comes to viable or sustainable farming practices on different land types, and this should be reflected in any future strategy, with a far greater focus on supporting extensive, lower impact agricultural practices in high nature value farmland and marginal lands, and support for agro-forestry schemes.

Question 10. How can circular agriculture, the blue economy and the bioeconomy be integrated into the next strategy to build new value chain opportunities?

This is a leading question, incorrectly suggesting that these ideas are necessarily good by definition. The ill-defined use of all of these buzzword terms in is emblematic of the poor policy communication by the Department of Agriculture, Food and the Marine (DAFM) in this and previous public consultations. Academic analysis[9] indicates 'bioeconomy', and associated terms, have been misappropriated by "powerful lobbies", the existing economic stakeholders, in a way that "can be seen as a semantic and conceptual hijacking", assuming rather than requiring environmental compatibility.

[9] Vivien, F.D. et al., 2019. The Hijacking of the Bioeconomy. Ecological Economics, 159, pp.189–197. https://doi.org/10.1016/j.ecolecon.2019.01.027
"the use of the term "bioeconomy" in support of the hypothesis of a perpetual economic green growth can be seen as a semantic and conceptual hijacking of Georgescu-Roegen's term "bioeconomy". In this third bioeconomy narrative, the change in socio-technical trajectory required for the ecological transition is supposed to be delivered through market sig- nals. As such, there is every indication that the economic stakeholders involved will favor the substitution of molecules in existing markets and well-established value chains. The dominant design and economic organization that the powerful stakeholders behind the type III bioeconomy are trying to establish will almost certainly mimic those of the petrochemical industry."

The only way in which these buzzwords can become meaningful in an agri-strategy is if chemical inputs and feed imports are strictly limited within strongly enforced and reducing pathways. Only in this way can less wasteful, 'circular' flows, within Irish agriculture and land use, become incentivised to use limited resources more efficiently. The primary focus required to give a credible basis for "value chain opportunities" will be if the Irish agricultural sector can show evidence of reduced pollution to climate, air and water, and increased biodiversity (as shown by rigorous and independently verified monitoring).

Question 11. What do you think the drivers and barriers will be for improving the economic viability and performance of farms, fishing businesses and agri-food businesses in the period to 2030?

The major barrier to redirecting Irish agriculture toward sustainable food production is the continued Government supported industrial regime favouring the short-term profits of large agri-food businesses over the long-term well-being of Ireland's rural society and environment. Ensuring sustainable, long-term economic viability and performance will require wholesale changes to the regime on the lines strongly endorsed by the Citizens' Assembly: limiting and taxing environmental pollution from agriculture (ultimately paid for by consumers) and using the revenues raised and redirecting any subsidies toward supporting diversification.

As described in recent research examining the outcome of Ireland's previous agri-food strategies[10], the biggest barrier to achieving sustainable food production in Ireland is the existing 'iron triangle' of powerful regime actors comprising agri-food processors, the farming organisations (which preferentially represent the interests of large landowners), and government, including the DAFM and Teagasc, which could be argued support industry priorities rather than the long-term welfare of farmers or the public good. The research found that:

> *'Overall, it is apparent that FH2020 is aligned with productivist norms and beliefs of the regime, despite the mantra of sustainable food production and a newly formed collaboration between public and private actors, cannot be classified as a regime change.'*

[10] Linton, H.A.H., 2019. What drives sustainable agricultural transitions? An analysis of the regime change in Irish dairy farming Master's thesis MSc Sustainable Development. pp.1–77. https://dspace.library.uu.nl/bitstream/handle/1874/382062/SD_ESG_Linton_HLinton%20Thesis.%205806488.pdf?sequence=3

It highlighted that the "productivist regime" of Irish agriculture has remained stable, and has focused on the major dairy industry expansion:

> *'the Irish dairy sector has failed to make a sustainable transition due to a dominant coalition of powerful actors who have failed to apply radical sustainability action within the dairy industry and have continued to pursue the productivist paradigm.'*

and:

> *'The beliefs of the regime actors are largely in accordance with the productivist paradigm of the regime in that they follow the principles of increasing production and applying input efficiency as a method for mitigating the environmental impacts of such production. Regime stability has resulted as these actors have repeatedly been able to keep rules and norms aligned with their own beliefs. Examples have been the IFA's ability to put pressure on the Government to seek a derogation of the Nitrates Directive, the industry's control over the development of FH2020, and the implementation of sustainability measures since then (OG, SDAS, ASSAP). By enforcing such stable and dominant beliefs throughout the regime, the rules and norms remain entirely 'taken for granted'. This leads to the implications that no regime actor openly acknowledges the problems of rising GHG emissions or diminishing ecosystems. This research thus accepts the third hypothesis because ultimately, regime change has not occurred because beliefs have remained entirely aligned with the regime rules.'*

Question 12. Innovation is now widely recognised as a key driver of long-term growth and sustainable development. What type of approaches and processes could assist the Irish agri-food innovation system to address economic and societal challenges and facilitate increased networking, collaboration and investment in sustainable growth areas?

The question is predicated on the assumption that long-term growth and sustainable development are viable policies, and can co-exist. Innovation within the current intensive framework cannot, and will not provide for sustainability, nor can it address the current challenges facing the agriculture sector on all fronts. Sustainable growth is an oxymoron, as eloquently elucidated by senior economists at the World Bank, Daly and Townsend (1993)[11]:

[11] Daly, H. and Townsend, K. (1993) Sustainable Growth: An Impossibility Theorem. Valuing the Earth: Economics, Ecology, Ethics. MIT Press. ISBN 0-262-54068

'In its physical dimensions the economy is an open subsystem of the earth ecosystem, which is finite, nongrowing, and materially closed. As the economic subsystem grows it incorporates an ever greater proportion of the total ecosystem into itself and must reach a limit at 100 percent, if not before. Therefore its growth is not sustainable. The term "sustainable growth" when applied to the economy is a bad oxymoron'

Ireland's "Irish agri-food innovation system" is fundamentally focused on scaling up animal food production, yet there is overwhelming evidence that the trajectory of global growth of animal food demand is environmentally unsustainable, inherently inefficient, produces net negative food calorie conversion, and negative health outcomes. All major research reviews (IPCC, the Lancet, the FAO), conclude that dietary change, particularly reducing beef and dairy consumption, is essential to reverse these trends and to support the SDGs.

As outlined previously, Ireland's net effect on global food security is negative owing to imported feed calories. Moreover, the fertiliser and land which are used to produce local fodder are being diverted from far more efficient uses, such as direct-to-human food crops or native forestry. These indirect impacts on emissions and global food security are uncosted by economic analyses of Irish agriculture, including the economic analysis included by the DAFM with this consultation.

Long term growth in animal agriculture is simply not a realistic or sustainable objective.

Question 13. What actions need to be taken to ensure that Irish agri-food captures more value in both our domestic and export markets?

Any economic evaluation needs to fully cost negative externalities, including those due to the current endemic overuse of synthetic chemicals (fertilisers, pesticides and antibiotics) in Irish agriculture, and the damaging effects of ongoing and cumulative pollution and waste disposal. Without enumerating the current full costs of the agricultural system, any such economic valuation will be both flawed and invalid within guidelines of the Public Spending Code.

Question 14. Are there any other learnings or best-practice examples in other economic sectors or other countries that could be applied to improve the competitiveness and innovation of the Irish agri-food sector?

This consultation question incorrectly implies that competitiveness and innovation are positive for the common good of Ireland's people and environment. On the contrary, a

major problem for Ireland is that highly unsustainable outcomes (herd expansion, N-fertiliser overuse, slaughter waste, increases in live animal exports) from agricultural expansion have been unhelpfully driven by efficiency-focused competitiveness and innovation of the livestock-dominated Irish agricultural sector, focused on increasing profits for existing vested interests in this sector.

Other countries are showing far more learning than in Ireland. In France and Denmark, effective limits on nitrogen fertiliser use have driven innovation and increased the competitiveness of diversification and organic farming, boosted by strong marketing to support this transition. The failure to reduce nitrogen pollution in the Netherlands has resulted in a cull of cattle due to insufficient regard for livestock emissions and impacts.

New Zealand have acknowledged the urgent need to cut nitrogen fertiliser use and steadily reduce methane emissions. In addition, their in-depth scientific[12] [13] and policy consideration[14] and media analysis of climate action and pollution provides a stark contrast to the rhetoric of Ireland's Minister of Agriculture[15], supported by the Department of Agriculture and Teagasc agronomists.

The reports from the Oireachtas Committee on Agriculture have been similarly biased toward maintaining the status quo. It is only recently that Teagasc scientists and the Climate Change Advisory Council have begun to question and critique the evident failure of this rhetoric to deliver sustainable outcomes for climate, nature or farmers. There is clear room for improvement, and this can be modelled on proven European and International best practice examples.

Question 15. What measures need to be taken in the period to 2030 to improve the social sustainability of Irish farms?

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[12] Reisinger, A., 2018. *The contribution of methane emissions from New Zealand livestock to global warming.* https://www.pce.parliament.nz/media/196482/contribution-of-methane-emissions-from-nz-livestock-to-global-warming.pdf

[13] Reisinger, A. & Leahy, S., 2019. *Scientific aspects of New Zealand's 2050 emission targets.* pp.1–20. https://www.nzagrc.org.nz/user/file/1941/Scientific%20aspects%20of%202050%20methane%20targets.pdf

[14] Interim Climate Change Committee (2019). Action on Agricultural Emissions. Action on agricultural emissions. Pp.1–148. https://www.iccc.mfe.govt.nz/assets/PDF_Library/f15921453c/FINAL-ICCC-Agriculture-Report.pdf

[15] An Taisce (2018) An Taisce has called on Minister Creed to retract misleading Dáil statements on rising dairy emissions. http://www.antaisce.org/articles/an-taisce-has-called-on-minister-creed-to-retract-misleading-d%C3%A1il-statements-on-rising

As outlined in our answers to previous questions, social sustainability should be an integral consideration in any future agri-food strategy. Irish farmers and fishers can play a key role in establishing an equitable, localised, diverse and secure food production system, with a concomitant regeneration of rural societies and livelihoods. This type of food production system, which would need to be well supported by top down measures and incentives, would breathe new life into rural societies, which are now largely being failed by an ever more industrialised agricultural system which favours large land-owners.

There are tangible examples of where this has been proven to work, and where citizens have been reconnected with farming, land and food, such as in Liege in Belgium[16], Totnes in Devon and Cloughjordan Ecovillage in Tipperary. These models have been proven to work, and the Irish agri-food sector could adopt such an approach.

Question 16. Given the relatively slow progress being made in generational renewal on farms, what type of policies could be implemented to speed this up?

Supports for mixed farming, especially organic agriculture and horticulture, which offer higher employment rates than cattle farming. The Irish farming sector is also disproportionately dominated by male farmers. The involvement of women in the farming sector could hugely boost the numbers, and incentivisation of mixed and organic farming is a clear path to achieving that. Targeted recruitment of female farmers should be a serious consideration in the drive to recruit the next generation of farmers.

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Question 17. Businesses are increasingly being measured by society not only on their economic performance but also on their corporate and social performance. What should the Irish agri-food industry be doing to address this? What key words would you wish to associate with a socially responsible agri-food sector?

They keywords outlined in our response to question 8 are also valid here: Resilience, diversity, equity, carbon-neutrality and self-sustainability.

Any failure to address the water pollution, biodiversity loss and increases in ammonia and GHG emissions which are largely driven by the current agricultural system should be viewed as a failure to society at large. The current system is putting our collective welfare and future at risk. The current and past agri-food strategies (FH2020 and FW2025) are utterly

16 https://www.theguardian.com/environment/2019/oct/16/london-sustainable-environmentalist-tooting-pop-up

failing in regard to social and environmental responsibility, and the agricultural sector is increasingly, and justifiably going to be held to account by society at large. Unless there is a dramatic change of direction in the next agri-food strategy it will be found wanting in this regard.

This may have legal implications for the agri-food sector. A recent high court ruling by Justice Barrett outlined the constitutional right to environmental protection "*that is consistent with the human dignity and well-being of citizens at large*". As such, with an ongoing, environmentally damaging business as usual approach the agricultural sector may find itself on the wrong side of the law.

Question 18. Societal concerns around ethical and sustainable practices, including animal welfare and the use of medicines and other inputs, as well as broader food and feed safety and authenticity concerns, have been growing in prominence and some have connected this with a social licence to farm/fish. How do you think the next strategy should address this to further enhance our credentials in these areas?

The bodies and agencies central to the preparation of FH 2020 and FW2025 clearly did not consider the importance of wider societal concerns when preparing previous industry plans. Animal welfare and ethics were not a key concern in previous agri-food strategies, with economics being the principle driver.

Changing social norms, such as moves towards organic, plant-based diets, should be embraced and supported. The new strategy should seek to meet the demands for lower emissions, less consumption and healthier diets. Rather than see this as a threat to Irish agriculture, and attempt to counter this with 'enhanced environmental credentials', the new strategy should be tailored to accommodate changing consumer demands.

Our credentials do not hold up to scrutiny, and a new approach is necessary, not unfounded 'glamour stories[17]'. Origin Green, the marketing programme from Bord Bia, is rapidly becoming a byword for greenwash advertising rather than sustainability. The backlash has already begun, with the american legal action taken against Kerry Group in regard to the

[17] https://www.independent.ie/business/farming/agri-business/greenwashing-could-backfire-on-farming-37971831.html

inaccurate 'grass-fed' claim for Kerrygold butter[18]. The next agri-food strategy should focus on providing genuinely sustainable and ethical products, as opposed to an Origin Green type marketing campaign which attempts to justify and greenwash the current failing model. This should be a supporting pillar of a new, societal-based, vision for agriculture in Ireland.

An Taisce would request that you take these comments into account

Is mise le meas,



Elaine McGoff, PhD

Natural Environment Officer, An Taisce- The National Trust for Ireland.

18 https://www.irishtimes.com/business/agribusiness-and-food/kerrygold-faces-us-lawsuit-over-grass-fed-cows-claim-1.3576513