



Pádraic Fogarty
Campaign Officer
Irish Wildlife Trust
8 Cabra Road,
Dublin 7,
D07T1W2

Department of Agriculture, Food and the Marine
Kildare St.,
Dublin 2

June 15th 2021

Irish Wildlife Trust submission to the Draft Agri-Food Strategy 2030

To Whom it May Concern,

The Irish Wildlife Trust (IWT) is a national, charitable, membership-based organisation which was established in 1979. Our goal is to raise awareness of our natural heritage and its benefits to people. We would like to make a submission as part of the public consultation on the Draft Agri-Food Strategy 2030 (referred to hereafter as the Strategy) and the associated environmental reports.

In general terms, the IWT believes that the Strategy is entirely inadequate to meet the challenges which we face over the coming decade. Ireland has very well-defined targets in terms of climate, biodiversity, air and water quality. These are absolute objectives and cannot necessarily be met with improvements in efficiency. The Strategy gives no indication as to how these targets, as they pertain to food protection and land use, are to be met.

The Strategy also ignores the potential of going above and beyond the legal requirements of environmental laws and objectives. It fails to set out a vision of what food production could look like were practices to be adopted which nourish and regenerate soil, biodiversity and natural ecosystems.

While there is acknowledgement that we face serious environmental challenges, this is contradicted a number of times in the Strategy, especially with regard to the role of the 'Origin Green' marketing label in shaping public perceptions. We cannot address the challenges we face without fully acknowledging the scale of ecological damage that has been done to our country or the scale of pollution which is generated by our food system.

While the Strategy states that Ireland is to become "an international leader in Sustainable Food Systems over the next decade", there is no evidence to show that this is anything more than a slogan. This is most clearly demonstrated in the belief that output in agricultural production can continue to grow while meeting environmental targets. In fact, we would argue that the belief in continued, indefinite

growth is the greatest obstacle to achieving a food system that operates within the finite planetary boundaries while meeting human needs.

We believe that publishing this Strategy in advance of the Climate Action Bill becoming law, and in the absence of an agreed Common Agricultural Policy, is premature. The Strategy, if published, risks being rapidly superseded by these developments, thereby nullifying the exercise.

Here are some specific issues with the Strategy that present concerns to us:

- For nearly a decade, Ireland has harnessed its international association with the colour green to sell an image of environmentally-friendly food production. This was based on marketing rather than sound science and indeed, since the launch of ‘Origin Green’ in 2013, key indicators on the health of our environment have deteriorated¹. **Rather than “strengthening” Origin Green, the initiative needs to be scrapped entirely.** Actually tackling environmental pressures in a real and measurable way is the only way that Ireland can develop a product offering that can be sold as ‘green’.
- It is concerning that the Strategy is not referenced with peer-reviewed science to support claims and assertions which are made.
- **Policy Coherence.** The Strategy rightly identifies “a need for policy coherence” however there is no mention of key environmental policies and directives, namely the Birds and Habitats Directives, the National Biodiversity Action Plan or the EU’s Biodiversity Strategy. The environmental targets of the Common Fisheries Policy are not acknowledged. The aims of the Water Framework Directive and the Marine Strategy Framework Directive should be given much greater prominence along with strategies for how the aims of these directives are to be met.
- The Strategy proposes more targeted agri-environmental schemes and this is welcome. **Results-based, High Nature Value farming initiatives** need to be mainstreamed across all land-use types and not confined to economically disadvantaged areas or what has traditionally been viewed as ‘marginal land’. The south and east of Ireland was home to curlews, corncrakes and unpolluted waterways only a generation ago, we must not succumb to ‘shifting baselines, lowered expectations and effective sacrificial zones where economic gains result in a degraded natural environment.
- **Carbon-farming** is theoretically attractive but is fraught with difficulty. Measuring carbon storage and sequestration rates from land is not currently an accurate science for most soil types. Gains are easily reversed and so carbon stored in soils or vegetation can be easily released to the atmosphere following a change to the land use or catastrophic events (e.g. droughts or fires). There are many reasons why soil and ecosystem restoration can benefit farmers and nature. Support could be in the form of payments for ecosystem services which is a wider concept than carbon farming.
- It is very important that forests are not grown for the purposes of **biomass**. Growing trees for fuel is not carbon neutral and is not a sustainable practice².

¹ Environmental Protection Agency. ‘Ireland’s Environment 2020 – An Assessment’.

² See <https://www.fern.org/issues/bioenergy/>

- The Strategy says that Ireland will have a ‘climate neutral’ food system by 2050. However the proposed cut in methane of 10% by 2030 and 24-47% by 2050 is at odds with this headline target. The Strategy suggests that “technology will play a key role in underpinning this ambition” however this amounts to little more than **techno-optimism**. There is no technological solution that is likely to be widely available within the next decade that will permit greater growth in output while meeting climate, biodiversity, air and water objectives.
- The science suggests that meeting environmental and food security objectives requires a shift to **plant-based diets**, a reduction in **food waste** and the **restoration of natural ecosystems**, including rewilding of vast tracts of land and oceans³. The Strategy is not aligned with this approach.
- Box 2: The Role of Animal-Sourced Foods in Diets is a declaration of opposition to the emerging technology of lab-grown proteins. Whether this development is desirable or not, it is surely prudent to assess the likely **severe disruption** to the Irish food-production model that this presents. Technological disruption (which, as noted earlier is relied upon by the Strategy to meet the climate neutral target) can happen in a dramatically short space of time (years rather than decades) and simply writing it off as merely a “sensory experience, but not as true replacements in terms of nutrition” is not a strategy for adaptation. In short, the potential expansion of synthetic proteins presents a major social and economic risk for the Irish food industry that is not addressed in the Strategy.
- It is very concerning that the explicit goals of the **Common Fisheries Policy** (CFP) to end *all* overfishing and the discarding of unwanted catch are not clearly stated in the Strategy. The Programme for Government states that “we are fully committed to the environmental objectives of the CFP”. Progress on meeting “maximum sustainable yield” for commercially exploited fish populations has stalled, and even regressed, in recent years. The use of **bottom trawling** in mixed fisheries is particularly problematic due to its association with over-fishing, by-catch and discarding, loss of seafloor habitat and carbon emissions (estimated to be a quarter of Ireland’s total reported emissions). This needs to be recognised and the use of all bottom-towed gear should be phased out. Environmental degradation of the marine environment, combined with Brexit and the recent revoking of Ireland’s Fisheries Control Programme by the European Commission (due to allegations of illegal overfishing) have had a combined negative effect on the fishing industry. The Strategy glosses over these serious pressures.
- The goal to designate 30% of our waters as Marine Protected Areas by 2030 is welcome. This must include strictly protected ‘no take zones’ which allows for recovery of marine life. Indeed, recent research has shown that strictly protecting nearly half of the world’s oceans could result in the triple benefit of climate mitigation, biodiversity restoration *and* increasing fish catches⁴.
- It is welcome that there is a proposal to ‘research and promote the concept of **‘Regenerative Agriculture’** however it should be recognised that

³ Intergovernmental Panel on Climate Change (IPCC) Special Report on Climate Change and Land (2019); United Nations Environment Programme ‘Ecosystem Restoration for People, Nature and Climate’ (2021).

⁴ <https://www.nature.com/articles/s41586-021-03371-z>

regeneration of soil health is *central* to a food production system that benefits farmers, citizens (in terms of food security) and nature⁵. It should be the basis of all future farming and not consigned to a passing mention.

- Farming on **peat soil** is a significant source of greenhouse gases as well as a pressure on water quality and biodiversity. Indeed, the great majority of our peatlands are degraded and contributing to environmental pressures when they could be part of the solution⁶. There is an urgent need to restore peatlands everywhere. While there are limited circumstances where livestock on peatlands (e.g. dry heath) is compatible with environmental aims, in many circumstances the presence of farm animals (and especially free-roaming sheep) is detrimental⁷. For instance, grazing of any kind on blanket bogs is not compatible with maintaining or restoring ecosystem integrity.
- Goal 2: Restore and Enhance Biodiversity. This section fails to acknowledge that **Ireland is currently failing to meet biodiversity objectives** under the Birds and Habitats Directives. Much of this is due to agricultural, forestry and peat mining activities⁸. A pertinent example is the target to restore ‘favourable conservation status’ to the freshwater pearl mussel *Margaritifera margaritifera*. This critically endangered species is a qualifying interest of 19 Special Areas of Conservation including rivers of the south and east which have suffered declines in water quality over the last decade attributable to dairy expansion (the Slaney, Nore, Barrow, Suir, Blackwater). Restoring favourable status for this species will define the scale and nature of agricultural activities in these catchments and is arguably the greatest limiting factor on farming in these areas. Other species and habitats which are in bad status include the Atlantic Salmon, species-rich calcareous and machair grasslands as well as all of the peatland habitats which are listed under Annex I of the Habitats Directive. BirdWatch Ireland and the Royal Society for the Protection of Birds in Northern Ireland’s recent assessment that two thirds of all bird species are on their red or amber list of Birds of Conservation Concern is alarming. Much of these declines are due to land and sea uses which are not compatible with the ecological requirements of these species.
- Agricultural systems (as well as forestry) need to phase out the use of all **pesticides and chemicals**. Those which are a proven threat to water quality and human health, e.g. MCPA, need to be prohibited. It is disappointing that the Strategy merely calls for its use to be “reduced to the maximum extent possible”.
- The promotion of a National Soil Sampling and Analysis Programme is very welcome and could be the basis for a transformation of Irish agriculture to regenerative/agro-ecological principles.
- The development of a land use plan, as committed to in the Programme for Government is an essential step in aligning competing land uses and meeting environmental objectives.

⁵ Drawdown Project. ‘Farming Our Way Out of the Climate Crisis’. 2020. <https://drawdown.org/>

⁶ Haughey E. 2021. Climate Change and Land Use in Ireland. Environmental Protection Agency.

⁷ Chico et al. Application of terrestrial laser scanning to quantify surface changes in restored and degraded blanket bogs. *Mires and Peat*. Volume 24 (2019) Article 14

⁸ National Parks and Wildlife Service. Article 17 Reports. 2019.

A way forward?

The IWT is a signatory to the position paper produced by the Environmental Pillar, Stop Climate Chaos and the Sustainable Water Network⁹. We firmly believe that a food system that delivers for farmers, citizens and nature is possible but that this will require a radical reimagining of how land is used and how food is priced. The latter may be addressed by the application of a carbon and/or nitrogen tax on food. This approach must leave behind the belief that we can continue to increase output while achieving environmental goals. We cannot put our faith in unproven or yet-to-be developed technologies as a way of avoiding difficult decisions.

A lot is known about the physical environmental boundaries that we need to operate within. To our knowledge however not a lot of study has been done on the social and economic boundaries. In other words, what would farming in Ireland look like within environmental limits while securing farmers livelihoods and thriving rural economies? A single, national model for achieving greenhouse gas reductions (e.g. by reducing the number of farm animals) will not deliver on water and biodiversity objectives while it risks a widening of inequalities within farmers and rural communities.

The most appropriate geographic unit for such a modelling exercise is the water catchment. This acknowledges variations in soil and climate and the biodiversity objectives that are unique across landscapes. The Environmental Protection Agency, the National Parks and Wildlife Service and Teagasc should produce scenarios for each catchment so we know what mix of land use is required to achieve environmental goals. Supports to farmers could then be tailored to suit these scenarios. It may be a way to provide some assurance to farmers regarding their incomes while also having a coherent policy approach.

Similar modelling could also work in the marine environment. What areas need to be protected in MPAs? Where are the carbon-rich habitats that need to be protected? What benefit from no take zones could accrue to fishing communities over the medium to long term? This approach can meet environmental objectives without pitting one goal against another.

A range of policy measures will be required that include drastically reducing food waste and ensuring that the price paid for food both values the product while accounting for negative environmental effects which are borne by society.

In conclusion, the IWT believes that this Strategy is not fit for the challenge that lies ahead. It does not adequately acknowledge the scale and depth of our environmental commitments and fails to provide a roadmap for farmers and society on how system changes are to be made in an equitable manner. It is imperative therefore that a new plan be developed. We cannot afford to squander the next decade, only to be facing a radically, and possibly irreversibly, altered planet in 2030.

⁹ Towards a New Agricultural and Food Policy for Ireland Recommendations for Government. 2021

Notes on the Environmental Assessments.

The Environmental Report (pg 1) notes that “The Agri-Food Strategy to 2030 is a voluntary industry led strategy facilitated by the DAFM.” In the Strategy document itself however it states that “The [Stakeholder] Committee will prepare and present to the Minister for Agriculture, Food and the Marine, a strategy for the development of the agri-food sector for the period to 2030”. The Natura Impact Statement (NIS) states that DAFM is “the responsible authority for decision-making with regard to the screening and AA for the [Strategy]”. This confusion surrounding the ownership of the Strategy raises vital questions surrounding who is responsible for implementing mitigation measures which have been identified in the NIS.

We believe that the AA Screening, and in particular the NIS, are not fit for purpose. They do not contain ‘clear and definitive findings’ on the impacts of implementation of the plan. It does not present the ‘best available scientific’ information on the status of key species and habitats. Nor is there any clear acknowledgement that Ireland has failed to implement the Birds and Habitats Directives and that key indicators are overwhelming pointing in the wrong direction. No mitigation is suggested to address this.