

Environmental Pillar Submission to the Agri-Food Strategy 2030 Committee on Narrative document and 'Quality, Safe and Nutritious Food & Beverages'

Summary on Narrative document:

1. The topic of Food Systems and the push to position Ireland internationally has not been comprehensively discussed by the Committee. This requires a detailed and informed discussion by the Committee about the theory behind this proposal and how it would impact farmers, and all environmental attributes, as well as how it relates to the global food system. We request that there is a detailed discussion of this.
2. Positive language on a food system in line planetary boundaries in the narrative is not supported by the required transformational action in the Strategy to achieve this. The narrative pitches this Strategy as different from Food Wise 2025 but we have seen no evidence of any difference and fear the same outcome with all the environmental indicators continuing to worsen and farmers not benefitting and being pushed to the limits to make a living. This decade is supposed to be the decade of action on climate and biodiversity, transformation is required and our earlier submissions and indeed the Farm to Fork and EU Biodiversity Strategies provide a pathway.
3. The narrative document's aim that Ireland's food system would be recognised as a leader in sustainability internationally was trialled already by Origin Green and has fallen flat as the evidence did not support it. It would appear that the proposed focus of Food System sustainability is a new marketing approach and since we see no actions which would transform Irish agriculture to achieve sustainability in this Strategy, we urge caution with this approach.

Summary of Key Points on 'Quality, Safe and Nutritious Food & Beverages'

1. Welcome the endorsement of the Farm to Fork Strategy, but the chapter doesn't commit to any of the actions in this Strategy, including a move to healthier diets for people and planet.
2. The chapter recognises that consumers are moving towards a plant-based diet but doubles down on livestock production and awareness raising of this, to meet global demand which is in conflict with goals to halt environmental degradation here and restore it. This poses a significant threat to meeting environmental goals and a risk for Irish agriculture due to lack of diversification and a missed opportunity for tillage and horticulture farmers here.
3. Worrying references to importance of trade but no assessment of link between Irish exports and impacts to development of local food systems in developing countries have been made. Focus on *Advocacy internationally for sustainable healthy diets*, but this actually seems to be about ensuring there's a market for beef and dairy in a world where a disproportionate amount of land use is already dedicated to meat production.

Detailed Notes on Narrative Document

1. Food Systems in line with planetary boundaries

“These realities have highlighted the interconnection between food systems, climate and health, leading to a broad international consensus that future agri-food strategies and policies must fit within human and planetary boundaries.” (Narrative document, p. 2).

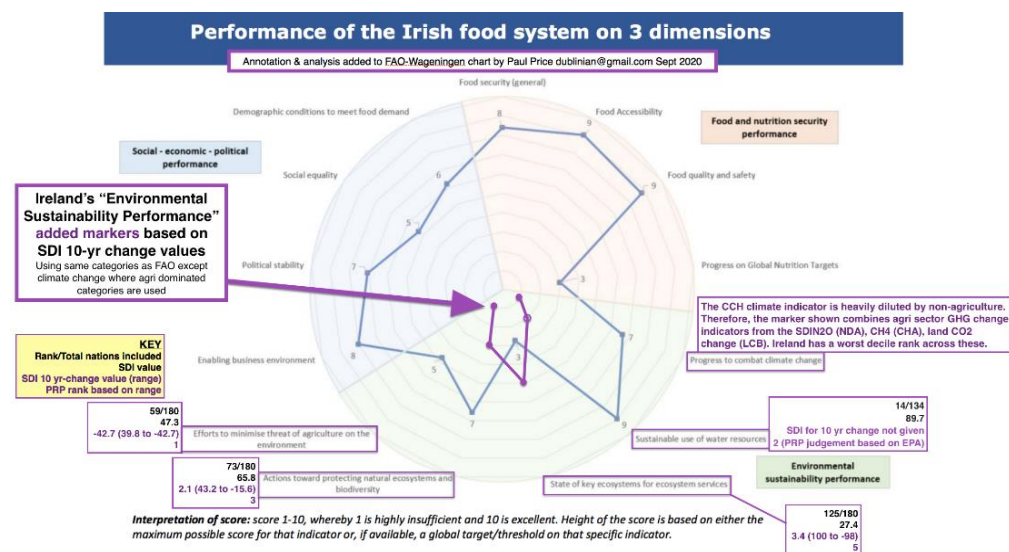
The language throughout the narrative document on planetary boundaries is positive. With acceptance that strategies and policies must fit within planetary boundaries and recognising that all the indicators show that current food production levels in Ireland are overshooting planetary boundaries, **how will the Strategy outline a phased reduction in production levels to 2030 to achieve this?** Perhaps the model for planetary boundaries developed by the [Stockholm Resilience Centre](#) might be assessed along with others.

However, to ensure Ireland achieves this goal of remaining within planetary boundaries, these have to be defined in relation to Ireland’s situation, and a suitable body tasked with monitoring progress must be set out. The EPA, the NPWS and other state scientific bodies provide reliable indicators of the state of the environment as it relates to farmland as opposed to Bord Bia’s sustainability reports which do not line up with official monitoring results.

In relation to planetary boundaries, the overuse of Nitrogen is the core driver for nitrates to water, ammonia to air and serious N2O and CH4 climate pollution. TA offers that, "the food systems approach requires an articulation of the link between policies on agriculture and food, the environment and health." After 10 years in the wrong direction, we need more than an "articulation" or "the wish that the 2030 Strategy should aim to position Ireland as an international leader in sustainable food systems."

Looking at the Barilla Foundation/ Economist Intelligence Unit (EIU) ‘Food Sustainability Index’, it is very weak indeed in any terms of measuring ecological, biodiversity or climate relevant impacts. The weightings and measures are highly contestable and could often be described as diversionary from real issues, e.g. failing to show net national food calories or protein output, or total nitrogen not just 'efficiency' per unit.

We have already been presented with a Wageningen study based on the similarly contestable Yale index, which failed to look at the 10-year change indicator in the *same* Yale index which showed Ireland doing very poorly. See "environmental sustainability annotations" below.



2. Discussion required on the narrative of Food Systems sustainability leader

It would have been helpful to have had an informed discussion on the narrative coupled with effective public participation at the start of this process of the development of the 2030 Strategy and not at the end. In terms of the pursuit of the Food Systems Approach, we do not know enough about this approach and there has been insufficient discussion about it. We are concerned that this approach is a marketing initiative along the lines of Origin Green. Ireland has already been selling itself as green and sustainable when the evidence does not back this up. Its reputation has been damaged.

The narrative document states that Ireland has an opportunity internationally to link its domestic ambitions, but it is very unclear on what the international opportunity is and how it relates to domestic ambitions. The production of the 2030 Strategy has been developed in a piecemeal manner, where we still have not seen a complete draft to get a sense of the targets, goals, objectives and the implications for the Irish biodiversity, water quality, greenhouse gas emissions or even the projections for farmers' incomes.

The Narrative states, *"The Committee has expressed the wish that Ireland's food system should achieve a level of sustainability that should enable the country to be recognised as a leader internationally, and that sustainability should constitute a source of competitive advantage in exporting our goods and services. We acknowledge that Ireland is not yet in a position to claim such a leadership position and that a number of other countries are also seeking to attain leadership positions."*

While the wish to achieve a better level of sustainability is positive, the motivation for doing so needs to be much wider than achieving a competitive advantage for the food sector. Achieving sustainability is a good in itself, and all stakeholders impacted by this need to be involved in ensuring that it is achieved - not just the food industry. We also have still not seen any action proposed within the Strategy which would indicate serious addressing of the issues of unsustainable greenhouse gas and ammonia emissions, catastrophic farmland biodiversity loss and declining water quality.

Further, sustainability needs to be very clearly defined, targets set, actions implemented and monitored by an appropriate body (i.e., EPA, NPWS). It is entirely inappropriate that this is currently undertaken by Bord Bia, the State's food marketing body. We wouldn't take claims to sustainability seriously from other countries' food marketing boards. Also, rather than choosing the Barilla/EIU index or another existing index to measure sustainability, the question needs to be asked **what do we want achieve in terms of sustainability and what indicators do we need to collect to monitor this?**

All potential indexes to be used should be assessed against this. Lastly, a comparative index of sustainability can be problematic as currently no country has a sustainable food system, so saying Ireland is in the top 10 of least unsustainable food systems is somewhat meaningless.

A base for what a sustainable food system is needs to be agreed with national and international expert input and only after achieving this base should Ireland be considered having a sustainable food system.

The Committee might consider reviewing the appropriateness of Origin Green, especially considering that all its statements of sustainability have no evidence base.

3. The premise that the Agri-Food Strategy 2030 is different to Food Wise 2025

The narrative states that, “Systems of food production, processing, packaging and distribution, and logistics that contribute to environmental degradation are no longer acceptable to society and consumers.” We suggest that they have never been acceptable. The Food Wise 2025 motto was that “environmental protection and economic competitiveness are equal and complementary: one will not be achieved at the expense of the other,” recognising the parity of esteem of environmental protection but still this was not enough to ensure environmental protection matters indeed worsened.

- We have no indication from what we have read so far in the various chapters how family farms, especially smaller farmers in the west of Ireland are to benefit from this Strategy.
- We have seen no concrete actions to support them or for farming to be consistent with environmental goals.
- The Minutes of the last meeting show comments which suggest that the farmer got no benefit from Food Wise 2025. We see no evidence that this Strategy will be any different.

Indeed, the chapter on primary producer viability and farmer well-being seems to send a message that farmers have to get big and efficient or perhaps get out. Recently the Irish Farmer’s Journal reported that in one year there’s been a drop of 6400 of people who claim to be primarily farmers or fishers and 2200 drop in jobs in agri-food businesses due to automation according to DAFM 2019 annual report.¹ Who is benefitting from Food Wise 2025?

Intensification and the pursuit of this model has resulted in severe environmental damage. Action on efficiency in dairy and beef has not delivered for the environment and has resulted in increasing dairy cow numbers. **We have seen no evidence that further efficiency will achieve GHG benefits or water quality benefits.** Fundamentally, underpinning the Irish dairy system is not grass but fertiliser.

The Narrative states that the Strategy proposes a ‘shift to more environmentally sensitive farming’ and will ‘involve a step-change towards environmental ambitions.’ This is not evident in the Strategy. Indeed, a shift is very different to a step change. Transformation is what is required in how we farm to operate within planetary boundaries and to undo the damage done to farmland biodiversity, climate, air and water pollution by previous agriculture strategies and underpinned by publicly funded policies.

We are deeply concerned that, in particular, we will see further declines of farmland bird populations and other biodiversity and will be looking at media headlines on species extinctions and more pollution in the years up to 2030. Indeed, the narrative document mentions little focus on biodiversity. Critically, we are concerned that these headlines will reflect badly on farmers who want to safeguard the environment. Policy and strategy are letting down the small farmer in favour of profits for agri-business.

4. Irish exports to developing countries

The Narrative states that, *“Dairy products and beef represent the largest component of Irish food and beverage exports. The next decade will see new challenges with non-animal based proteins becoming more available and competitive.”*

¹ Hurson, N, ‘Agrifood workforce falls by almost 9000’ (Irish Farmer’s Journal October 24th 2020)

This issue will be discussed within our report but we are working on the assumption that the demand for high quality sustainably produced dairy products and beef will continue to grow, especially in middle income developing countries with a growing middle-class population, and that it is a legitimate objective for Ireland to meet such demand with sustainably produced products.

Ireland has an important non-commercial link to the global food economy – its long-standing commitment through its aid programme to helping the poorest and undernourished. That commitment continues but has changed its focus: Ireland's international development policy, 'A Better World' (2019) recognised that the nature of the malnutrition challenge facing Africa, a key focus of its development policy, is changing. Malnutrition is no longer just about undernourished and hungry people; there are increasing numbers affected by micronutrient deficiencies and obesity with serious consequences for health. 'A Better World' includes a commitment to tackling these new challenges through the lens of sustainable food systems. An important part of that policy includes helping partner countries to enhance their own food and nutrition security and tackle maternal health and early childhood nutrition. Ireland should play an important advocacy and policy role at the 2021 FSS, seeking to create the political will to improve the food and nutrition security of the world's poorest people.

It is important to recognise that these commercial and non-commercial aspects of Irish policy are complementary. Should Ireland gain as a thought and policy leader on an issue that will become increasingly important over the coming decade: economically, in becoming more competitive not only in the products we export but in the services associated with implementing sustainable food systems, the demand for which will also increase substantially in the coming years." (P.8/9)

The statement that, "the commercial and non-commercial aspects of Irish policy are complimentary" is important but to ensure this happens a clear set of principles and oversight mechanisms need to be put in place. For example, it is only a legitimate objective for Ireland to export to middle class markets in poorer countries once this doesn't negatively impact the development of indigenous Agri-food sectors in these countries: how will Ireland ensure this doesn't happen?

Even better, Ireland should explore the possibility of linking up with local producers in terms of sourcing their produce. For Example, Oxfam is involved in a campaign, [My Milk is Local](#), focusing on these issues.

5. The marine environment

In relation to fisheries, fish stocks as populations of waterbirds that overwinter in Ireland's bays and estuaries are in trouble, and conservation of the marine environment in particular appears to be an afterthought in both the narrative and the report. We have previously sent information on conservation of the marine environment, but this is not reflected adequately.

6. Notes on Strategy Chapter - Mission X: Provide Quality, Safe & Nutritious Food & Beverages, that are Consumer-Oriented and Sustainably Produced

6.1 No reference to global reports on unsustainable meat and dairy heavy diets and that we have to cut these down.

6.2 Chapter says it is focused on sustainably produced food, but no detail of this is provided.

6.3 Chapter says it endorses Farm to Fork but text not in line with this endorsement and appears to undermine it in ways:

- Farm 2Fork is not only about 'mobilising action' but has specific goals to be achieved relating to fertiliser use, reduction in pesticide use, etc.

- The text focuses on perpetuating meat and dairy exports and importance of meat in diets, with no mention of linkage with cutting emissions, reversing biodiversity loss on land and sea, and restoring it.

6.4 Diets

In relation to diets, the chapter states that, “Farm to Fork highlights the urgent issues facing the EU’s population in terms of nutrition: the triple challenge of malnutrition (undernutrition, overweight and obesity, and micronutrient deficiencies) as well as the lost opportunity represented by food waste.”

There are no references to under-nutrition and micronutrient deficiencies in Farm to Fork-the attribution of this reference to Farm to Fork needs to be removed.

Farm to Fork does say: the rise in overweight and obesity rates across the EU by 2030 is critical. **Moving to a more plant-based diet with less red and processed meat and with more fruits and vegetables will reduce not only risks of life-threatening diseases, but also the environmental impact of the food system.** Instead of embracing this, the chapter doubles down on livestock production and the need for a narrative to counteract the health benefits of a plant-based diet.

The chapter states, *“Strong growth is being witnessed in the sales of milk and meat alternatives. For example, sales of meat substitutes grew by 10% in 2017 and 18% in 2018 and some predict that cultured meat and ‘novel vegan meat replacement’ will account for over a quarter of all meat consumed by 2030, rising to 60% by 2040. Given the dominance of meat and dairy in Ireland’s agri-food output, this evidently poses a significant economic and social sustainability risk. This should be addressed by the agri-food sector ensuring it is positioned as a global leader in the production of natural, sustainably produced animal-based food.”*

This is very concerning and not in line with Farm to Fork, as the chapter does not present a positive strategic directional change to support more non-meat proteins even though the information provided suggests that consumers are moving to a plant-based diets. If left as is, this represents a missed opportunity for the Irish horticulture and tillage sector, and in growing organic farming to match consumer trends. Surely if these market trends towards non-meat protein are correct, Ireland should be changing its agricultural mix to reflect consumer preferences?

And the next sentence of the chapter says, *“This should be framed in the context that livestock is crucial to food and nutrition security, increasing food availability, and providing for diverse, healthy and nutritious diets”*. It is not clear why Ireland would pursue this strategy when livestock rearing takes up a disproportionate amount of land use globally?

A section from Box 1 in the chapter is extracted below. **It is our view that this is not an objective analysis of the role of meat in a healthy diet. Global malnutrition has nothing to do with people choosing to not eat meat it is to do with poverty and inequality.**

Box 1

In considering the merits of animal sourced food, it is noteworthy that more than 200 million children under five years of age, worldwide, face a life adversely affected by early years of undernutrition. Many more of the world’s population suffer preventable diseases, infections and morbid events because of lifelong dietary deficiencies – many key health promoting nutrients (essential amino acids, vitamins A, B₁₂, and D and minerals, iron, zinc, calcium and selenium), either are most efficiently, **or are only, included in the diet through moderate consumption of animal sourced foods. Our own National Children’s Food Survey 2017-2018 found that significant numbers of children have inadequate intakes of vitamin D, calcium, iron and folate and appropriate intake of milk, fortified milk and meat could address these inadequacies.**

Research by Cassidy et al. suggests that by growing food exclusively for human consumption — rather than using cropland to produce livestock feed and biofuels—global calorie availability could be increased by as much as 70%, feeding an additional 4 billion people.²

Reducing meat consumption to recommended healthy levels and increasing the amount of fruit and vegetables instead can help reduce unnecessary deaths³ and deliver significant economic benefits to governments by reducing health treatment costs and productive days lost.⁴ A landmark 2019 study by over 30 world leading scientists, and published in the leading medical journal *The Lancet*, classified a healthy diet as one that ‘largely consists of vegetables, fruits, whole grains, legumes, nuts, and unsaturated oils, includes a low to moderate amount of seafood and poultry, and includes no or a low quantity of red meat, processed meat, added sugar, refined grains, and starchy vegetables.’⁵

In 2010, the ‘western style diet’ was estimated to cost the world over \$1.4 trillion in health care costs and lost productivity.⁶ At the level of individual citizens, healthy diets need to be encouraged through a combination of ‘carrot’ and ‘stick’. Carrots or ‘soft’ interventions can involve education; promotion of sustainable and healthy diets, behavioural interventions, e.g. offering more low- or no-meat options, changing how these options are described to promote uptake (e.g. tasty rather than healthy⁷) and reducing the amount of meat in classic meat dishes. The ‘sticks’ could include reallocating subsidies from intensive livestock farming to more sustainable systems and shifting to food systems which incorporate environmental costs. As this will mean higher food prices (or at least much higher meat and dairy prices), such a shift will have to be supplemented by social food policies, including promotion of sustainable and healthy diets to ensure good healthy basic nutrition to all, and fiscal policies which ensure that all citizens can afford to purchase safe and healthy foods, in particular vulnerable groups in society. It has been shown that fiscal policies, such as taxes, need to be part of a wider programme that delivers visible advantages to citizens.⁸

Although cultural eating patterns can be deeply engrained, attitudes are already shifting, for example in Portugal vegetarianism rose by 400% in the last decade.⁹ The rise in alternative protein sources is also helping drive this cultural shift.¹⁰ There has also been a growing trend towards ‘flexitarianism’; people who are reducing their meat consumption.

In the UK, the meat alternatives market grew by 63% between 2012 and 2017. This illustrates that people’s attitudes to dietary preferences are more fluid than once thought.

The reduction in overall volumes of livestock production should go hand in hand with a shift to extensive grazing. Grazing at low stocking densities has a role to play in maintaining many High Nature Value (HNV) systems. Grazing is important for healthy grasslands that create favourable habitat for many species (e.g. species such as the Skylark, Hen Harrier, and Meadow Pipit which rely

² <http://iopscience.iop.org/article/10.1088/1748-9326/8/3/034015/pdf>

³ https://apps.who.int/gb/ebwha/pdf_files/WHA70-REC1/A70_2017_REC1-en.pdf#page=27

⁴ <http://www.fao.org/3/i3300e/i3300e00.htm>

⁵ [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(18\)31788-4/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(18)31788-4/fulltext)

⁶ <http://www.fao.org/docrep/018/i3300e/i3300e00.htm>

⁷ <https://www.eating-better.org/blog/language-takeaways>

⁸ [https://www.foodethicscouncil.org/uploads/publications/180522_Meat%20tax%20-%20Business%20Forum%20write-up .pdf](https://www.foodethicscouncil.org/uploads/publications/180522_Meat%20tax%20-%20Business%20Forum%20write-up.pdf)

⁹ <http://theportugalnews.com/news/number-of-vegetarians-in-portugal-rises-by-400-percent-in-10-years/43482>

¹⁰ https://www.theguardian.com/business/2018/dec/19/unilever-joins-meat-free-revolution-after-buying-the-vegetarian-butcher?CMP=share_btn_tw

on open areas, others such as curlew and lapwing require tussocky swards). A tailored approach is needed to provide a diversity of habitats for different species. In some areas this may mean reducing stocking density, but in others it may require an increase in livestock numbers to address under-grazing. The influential 2018 report by the RISE foundation,¹¹ finds that the vast majority of EU countries would need to reduce their stocking densities—in many cases to less than 30% of their current level—to stay within safe operating space in terms of climate change, nitrogen and public health. The report classified sustainable stocking density limits for achieving biodiversity benefits as between 0.5 and 1 livestock units per hectare.¹²

A 2018 study by the RISE Foundation on how and how much the EU should reduce its meat and dairy production to align with planetary boundaries highlights that mere efficiency savings and improved technology will 'not offer the step change required.' The report points to several studies, which call for halving consumption of meat (all types) by 2050, which would lead to an estimated 23% decrease in cropland required in the EU.¹³ The even more recent EAT Lancet study concluded that to stay within planetary boundaries we will have to reduce foods like red meat and sugar by over 50% and double global consumption of fruits, vegetables, nuts and legumes by 2050.¹⁴ So, what are the solutions we need to effect this change?

A restructuring of the livestock sector will be required to reduce the overall number of livestock. Those remaining should be fed on pasture, crop residues, by products and unavoidable food waste. We therefore need to reverse the trend to grain-fed from grass-fed systems and ensure that those grass-fed systems are extensive rather than intensive and designed to deliver synergies for nature through appropriate stocking densities. These were the conclusions of a recent study which found that if we ended grain-fed livestock production, leaving only existing grass-fed production (and cut food waste in half), we could feed the world on organic agriculture.¹⁵ This would compensate for the fact that organic is generally less productive than conventional agriculture but better for the environment and generally more sustainable in the long run.¹⁶

The chapter is focused on defending status quo and fails to push for diversification into more horticulture, expansion of tillage. There is a lot of focus on health but no independent health expert on the Stakeholder Committee. **This chapter must be brought into line with the EU Farm to Fork Strategy targets and to start the transformation to sustainable agriculture.**

Additional points

6.5 The chapter mentions the importance of trade, but there is no assessment of the link between Irish exports and impacts to development of local food (i.e. selling fat-filled milk derivatives to African nations undermining locals ability to develop a market and with a less nutritious product than their own milk, and where the fat is palm oil imported potentially from destroyed forests in Asia. [The EU milk lookalike that is devastating West Africa's dairy sector](#)).

¹¹ <http://www.risefoundation.eu/>

¹² http://www.risefoundation.eu/images/files/2018/2018_RISE_LIVESTOCK_FULL.pdf

¹³ <https://www.theguardian.com/environment/2018/sep/15/europe-meat-dairy-production-2050-expert-warns>; http://www.risefoundation.eu/images/files/2018/2018_RISE_LIVESTOCK_FULL.pdf; Similarly, A 2016 paper in the Journal Food Policy, suggests that that a 50% reduction in the consumption of beef (and mutton) will be required if the EU climate targets are to be met

¹⁴ <https://eatforum.org/eat-lancet-commission/eat-lancet-commission-summary-report/>

¹⁵ <https://www.nature.com/articles/s41467-017-01410-w>

¹⁶ <https://phys.org/news/2017-11-agriculture-world-meat-food.html>

6.6 In relation to Goal 3, Action 9 *“Advocate internationally for sustainable healthy diets. This should be the responsibility of all stakeholders: representative groups, food & drink companies and the public sector”*

Any analysis of sustainable healthy diets recognise that a disproportionate amount of land use is already dedicated to meat production. We are deeply concerned that Ireland may be aiming to promote this type of agriculture globally at huge societal cost.

6.7 In relation to Goal 4 Action 2, *“Increase efforts to gain and maintain market access for key product categories to priority international markets”*

The following must be added *“Where these efforts don’t negatively impact Ireland’s ODA commitments to prioritise the furthest behind first - and only when they are in line with planetary boundaries.”*

6.8 The link is unclear between this chapter and the UN FSS goals and the interface between both. It is not appropriate to include this without any detailed and informed discussion among the Committee members or the wider public (i.e. October 2019 public consultation).

6.9 Past Agri-Food Strategy stakeholder engagement processes are not models that we would recommend following, as the environment has not historically been considered on equal footing to the other sectors. The 2030 Strategy, coming at a critical time for action on climate and biodiversity, must include genuine public engagement and participation, building trust in the process and in the finished output.

6.10 We cannot have an Agri-Food Strategy without addressing food waste. Food waste accounts for 20% of waste annually at EU level and 40% here. Measures to address this must be included. The Commission is committed to halving per capita food waste at retail and consumer levels by 2030 (SDG Target 12.3). Using the new methodology for measuring food waste and the data expected from Member States in 2022, it will set a baseline and propose legally binding targets to reduce food waste across the EU.