



Environmental Pillar

Working for a sustainable future

The Environmental Pillar
MACRO Centre
1 Green Street
Dublin 7
Tel: 01 878 0116
www.environmentalpillar.ie

Mr. Tom Arnold
Chair
Agri-Food 2030 Strategy Committee

28 September 2020

Dear Tom,

The Environmental Pillar wrote a detailed submission with regard to draft Chapter 10, which we do not believe has been reflected in the revised draft in any substantive way. Our submission comments stand, and remain to be comprehensively addressed.

In addition, the environmental concerns we raise cannot be addressed in isolation from the content in the rest of the chapters. From the outset, we requested that environmental impacts, objectives and targets underpin sectoral objectives (beef, dairy, tillage, horticulture, etc.) based on the urgent requirement to align agricultural production with Ireland's legal climate, biodiversity, water and other environmental obligations. We have not seen any progress in this regard.

As previously stated by the Environmental Pillar, the timeframe for this Strategy needs to be paused so that ecological assessment of the proposed strategy, and effective public participation can be facilitated. Against the backdrop of uncertainty caused by Brexit, the Covid-19 pandemic and also due the current CAP negotiations, which are continuing, we do not see any compelling argument to rush this process through. Furthermore, the Food Wise 2025 strategy and for which there are a range of unresolved monitoring and remediation obligations, has a further five years to run.

The current agri-food strategy (Food Wise 2025) and most CAP schemes are driving environmental degradation. Only the EIPs for targeted species and habitats show promise but represent a fraction of the total CAP spend.

There have also been significant failings in raising public awareness of this proposed strategy which will affect all of us, and this needs to be remedied. The public is entitled to be informed about all agricultural plans, and are also entitled to participate in shaping those plans according to the Aarhus Convention and Maastricht Recommendations (http://www.unece.org/fileadmin/DAM/env/pp/mop5/Documents/Post_session_docs/ece_mp_pp_2014_2_add.2_eng.pdf). The Government has time to do this still. There must be a robust plan for awareness-raising, effective public engagement and consultation, which ensures that individuals and communities have the opportunity to contribute to this process.

We would draw your attention to the recent legal ruling by Mr. Justice Clarke on the National Mitigation Plan which outlined the requirement for a plan to provide a minimum level of detail:

[Para 6.45] *“I accept that the legislation clearly contemplates that knowledge will evolve and that the detail of the Plan will become more fixed as time moves on. However, that does not seem to me to prevent there being a clear present statutory obligation on the Government, in formulating a plan, to at least give some realistic level of detail about how it is intended to meet the NTO.”*

The same argument could be applied to the next Agri-Food Strategy in terms of the statutory obligation for DAFM and the Irish Government to provide a reasonable level of detail in regard to how the strategy aligns with, and delivers, our legal environmental obligations.

The Environmental Pillar once again asks for an evidence-based and credible plan for agriculture which will support farmers’ livelihoods and fair prices, protect and restore the farmland biodiversity that has been destroyed by past agriculture and forestry policies, reverse water quality declines and restore rivers, cut absolute greenhouse gas emissions and achieve our legal obligations, with clear targets, indicators and milestones. **Without this, the Environmental Pillar will not be in a position to support this plan.**

Yours sincerely,



Karen Ciesielski
Coordinator, Environmental Pillar