



Public Consultation on the Environmental Assessment of the Draft Agri-Food Strategy to 2030

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The Green Step Community is a not-for-profit group of people who have come together for their love of life on earth. Together we have been inquiring into the 21st century realities of farming, land use and food production in Ireland. Over the course of 10 podcasts and 1 live community event we have been listening and learning from one another to facilitate deeper understanding. In this *Tales from the Land* inquiry, we have heard from over 33 people their struggles and potential solutions relating to our Irish food system. These people have come from a range of different backgrounds including environmental educators, climate activists, researchers, traditional farmers, food growers and producers, ecologists, teachers, artists, business owners, a representative from the Irish Cattle Breeding Association and the Pearle Mussel Project for Results Based Agricultural Payment Schemes.

Overview

We at the Green Step find the Draft Agri- Food Strategy to 2030 to be ambitious in its goal for Ireland to “become a world leader in Sustainable Food Systems (SFS) over the next decade”. This is a goal we broadly support as we also support the 4 high-level targets. Yet we have some serious concerns about how these goals are to be implemented. There are several prescient problems that have either been overlooked completely or only briefly been addressed.

This strategy is an industry-led, export driven plan to increase production and output. We feel that this plan was created to increase the market for large farmers, processors and supermarkets. Smaller producers are overlooked for most strategy. The plan is deeply embedded in the current infinite growth economic model. This approach is understandable since the free-market capitalist neoliberal system has dominated western thinking for the past 50+ years, however going forward we strongly feel that a doughnut economic model, based on the work of Kate Raworth¹, and circular economy approach needs be implemented going forward. Should the mindset of infinite growth on a finite planet continue no matter what the strategy says small producers will be pushed out the market and environmental degradation will continue at pace.

Based on our community consultation we recommend that small producers and the environment be at the center of the new strategy and that the power of large processors and supermarkets reduced drastically. Localization of food production and an internalization of our market need to be at the heart of this transition with export and externalization coming second.² We ask "*Why do we expect other societies and nations to pay for the cost of our environmentally friendly agriculture?*" When we expect the 'other' (i.e. consumer/nation/business/community) to pay for the true cost of our food, either in the market or with subsidies, this furthers the inequalities in our globalized food systems and is not sustainable.

We need to focus on food sovereignty³ to be resilient to the challenges posed by the climate and biodiversity crises and lessen global inequality. Here it is important to know that to work for food sovereignty in Ireland means advocating for food sovereignty internationally. In Ireland Talamh Beo is a key network working for and educating people on the importance of food sovereignty.⁴ Furthermore we need to be striving beyond a sustainable food system to a regenerative food system. The true cost of food in the Irish market needs to be recognized with relevant outdoor, farm-based education campaigns (e.g. promoting the work of 'Farming for Nature') to highlight this while also promoting the GIY Grow It Yourself Movement.⁵

Of course, changes of this kind mean a revolution in our thinking of our food systems which can be very hard to address when people have vested interests in the current system. For this process of negotiation, we recommend working with independent facilitations of Non-Violent Communication⁶ and Restorative Practise⁷ to navigate challenging, transformative conversations and find solutions that best meet the needs of all stakeholders. These are the approaches we used during our Tales from the Land inquiry to great success.

The document below is broken into 2 parts.

Part 1: Key actions from the draft strategy that need to be reviewed and changed.

Part 2: The issues that arose during our conversations with stakeholders in the Irish agricultural system which are not mentioned in the draft strategy.

Part 1

Mission: A Climate Smart, Environmentally Sustainable Agri-Food Sector

We support the key targets of this mission. They are ambitious and the large-scale change we need to see as we face the dual crisis of Biodiversity Loss and Climate Change yet more is needed. Creating a Climate neutral sector by 2050 would be a significant achievement, but we question how this will be possible using the actions listed?

Goal 1 Action 2. "AgClimatise makes clear that an increase in the national cattle herd above current levels will jeopardize the achievement of the sector attaining climate neutrality by 2050"

The AgClimatise plan makes it clear that the national cattle herd is a key driver of greenhouse gas (GHG) emission in Ireland. It is the largest single emitter of greenhouse gases in the state. Yet there is no mention of having a limit on the number of cattle in the national herd? A cap is needed as currently the only limit on production is the amount of land. This has led to destruction of vast swathes of hedgerows scrubland and the accompanying biodiversity.

We acknowledge the important role played by genetic selection and the Irish Cattle Breeding Association to reduce the environmental impact of individual animals and herd emissions.⁸ However, this cannot be the primary solution to the GHG emission of the nation cattle herd, and it must be done in tandem with farm diversification and reducing herd size. All the farmers we spoke to lament the days were a smaller heard size and less manual labor was able to bring in a decent income.⁹ Now farmers are being pushed to be bigger and produce more for less return which increases economic stress and mental wellbeing within our farming community. Limiting and reducing our herd size while increasing farm diversification is essential to achieving our international and domestic obligations and this should be included in the plan.

Goal 1. Action 6. *Research and promote the concept of 'Regenerative Agriculture'*

This is vitally important and should be at the center of a new way in Irish agriculture yet it is only given 2 lines in the strategy. There is not a single measurable goal associated with this action. There is an important distiction between Sustainable and Regenerative. Sustainable is defined by the Cambridge dictionary as able to continue over

a period of time and causing little or no damage to the environment and therefore able to continue for a long time. Rather than cause little or no damage to the environment we need to be actively working to restore health to the ecosystems and soils across the country and this is where Regenerative Agriculture comes in. Regenerative means to improve and grow or be grown again. The language used in this report will drive the future change and it is key that the use of 'Regenerative Food systems' is prioritised over 'Sustainable Food Systems'

Goal 2. Action 1. *Carry out baseline biodiversity studies including habitats and hedgerows on every farm to inform future policy development and measure progress.*

Hedgerows are vitally important to biodiversity and connective for wildlife across our landscape. More are being lost every year, as more land is needed to support a growing herd. The strategy must contain a provision to protect and restore these hedgerows. Otherwise, it doesn't matter how many baseline studies you conduct if by the time you return, they are already destroyed.

Goal 2. Action 2. *Put in place more targeted agri-environmental schemes under the next Rural Development Programme (RDP) to protect and enhance Ireland's habitats and species*

We were heartened to see the Bride Project used as an example in this document. More environment schemes should be rolled out across the country to allow farmers to be paid for the ecosystem service they are providing. The great success of this project shows the interest not only in the public but in the farming community as well, for ways to farm for/with biodiversity. We would like to see agri-environmental schemes set up throughout the country so all farmers could be a part of this. All environmentally destructive agricultural subsidies should be phased out.⁹

Goal 2. Action 6. *Ensure the necessary actions for agriculture are included in the new All-Ireland Pollinator Plan and that they are disseminated to farmers.*

We support this and are encouraged to see this within the plan.

Goal 2. Action 7. *Ensure that farms and forests do not contribute to habitat destruction and isolation, and also protect features of cultural heritage and traditional landscapes.*

We support this and ask for more resources put into the protection and enforcement. Outdoor farm-based educations, especially for families and children is key here. All environmentally destructive subsidies given to farmers should critically revised.

Goal 2. Action 9. *Build on the measures introduced to protect and foster greater biodiversity in forests.*

This is an action we fully support

Goal 3

Agriculture is the biggest pressure on Irish Rivers. It is heartening to see a full goal on water protection. This plan must reiterate Ireland's commitment to being fully compliant with the Water Framework Directive. Water is the lifeblood of the land and society; it must be protected as the scarce and immeasurably important resource that it is. We are encouraged to see the commitment to reduction of phosphorus, nitrogen and sediment into our waters. There needs to be not only a reduction of fertilizers but mitigations put into every farm to protect water courses. E.g. riparian buffer strips, planting trees along rivers, silt traps, etc. Sadly, this strategy does not go far enough. From the actions stated we do not see how Ireland can become good water quality compliant by the deadline of 2027. Much more is needed to protect our water environment. We advocate from the use of mixed swards with clover, natural flood management, permaculture initiatives, farm diversification to improve this Goal.⁸

Goal 4. Action 1. *New Forest Strategy for Ireland*

An increase in forest cover would be a welcome sight, but the focus must be on native trees planted in appropriate areas. The current forestry model of planting Sitka spruce in the uplands has been detrimental to the natural environment. Increasing sedimentation and changing the pH of rivers. While also preventing the bogs they were planted on from sequestering carbon. This must be stopped. Native tree planting should be encouraged and non-native commercial trees highly discouraged and as for the case of Sitka spruce completely phased out.

Goal 4. Action 3. *Place farmers at the centre of a new and improved afforestation scheme*

This is something we would support fully with native trees being planted. This increases biodiversity on the landscape and will allow species to recover. It will also allow farmers to diversify their income. If farmers were encouraged to plant non-native conifers we would strongly disagree with this action.

“Finally, since the introduction of the WEF the amount of native woodlands planted as a percentage of total planting has doubled from 10% in 2018 to 20% in 2020”

This is fantastic news and a credit to the scheme. We would like to see it become more ambitious and make a commitment to plant a minimum of 50% native woods planted per year.

Goal 6 Action 1. *Examine biorefining,*

This needs to be greatly expanded as it has the potential to resolve many problems including energy production, silt run off ect.

Goal 6. Action 8. *The industry should urgently pursue more sustainable packaging.*

Single use plastics must be banned for food packaging. This need to be implemented immediately. Fermenting food is a key way to converse food in plastic free ways. We advocate for the support of a FYI Ferment It Yourself initiative across Ireland.

Part 2

During our Podcast series “Tales from the Land”. A number of ideas came to the fore again and again. These are not mentioned in the strategy and need to be considered as these are the concerns seen by those who work with the land every single day.

Export focused:

The major flaw with this plan is that it is export focused. The vast majority of the document speaks about finding and developing international markets. Only half a page dedicated to domestic and local Markets. We believed that this should be flipped on its head. The domestic market should be the main drive of this strategy. Of course, changes of this kind

mean a revolution in our thinking of our food systems which can be very hard to address when people have vested interests in the current system. For this process of negotiation, we recommend working with independent facilitations of Non-Violent Communication⁶ and Restorative Practise⁷ to navigate challenging, transformative conversations and find solutions that best meet the needs of all stakeholders. These are the approaches we used during our Tales from the Land inquiry to great success.

We are one of the most food secure nations on earth yet we are not food sovereign. As mentioned above food sovereignty needs to be a main priority. The carbon costs of transporting food across the world is not mentioned.

Cheap Food:

Food is currently at an incredibly low price. These prices do not consider the real cost of producing food: the environmental, social etc. Our current system is a race to the bottom. The cost margins for farmers are incredibly tight leading to more ecological damage. Producers are being squeezed at the bottom pushing out small farmers. Supermarkets and processors on the other hand are making large profits. We are encouraged to see plans to make this more equitable. Although we question "premiumization" as the method to do this. Why should we only grow "Safe, Nutritious and Appealing, Trusted Food" for the export market?

In the 1950's 50% of household income was used to buy food. Now that number is approximately 10%. This is not sustainable and contributes to the continued pressure and stress already put on farmers. Food must be priced at its true value. This makes food more expensive and makes society value it more while also respecting the important work that farmers do as the bedrock of our society. So, the poorest in society do not become adversely affected by this change to other cost of living expenses should be reduced. This would be best achieved by reducing rents across the country. Evidently there is a clear need for a more holistic approach to policy creation where housing needs and food systems can be in conversation with one another.

Local small scale food production:

There is no mention of supports for small producers. Under our current model you can only get subsidies if you are over a certain size of farm. This is a major impediment to people wishing to enter the industry. This needs to be changed. All farmers no matter

their size should be supported and encouraged. This again highlights the need for regenerative agriculture where not only the land is regenerated and supported but also the mental, emotional and economic wellbeing of farmers, food producers and their families.

Encourage production of food in the household:

There is no mention of supporting food production within the household. In the last number of years the use of allotments skyrocketed as well as food growing at home during lockdown. It is clear there is growing interest society at large for growing your own food. Yet there is not a single mention of this in the strategy. This is a major oversight. Citizens should be encouraged to grow food in their own homes. This would have a vast array of benefits.

1. It will reconnect people to how their food is produced
2. Reduce pressure on our food system and drastically reduce transportation related greenhouse gasses
3. Fermented foods increase overall health and could be used as a way to reduce obesity in the nation¹¹
4. When people grow their own food they understand the work that goes into it and would be willing to pay more for other locally produced food.

To this end we recommend that support and training should be made available encourage people to grow their own food. Outdoors equation is key and this approach can help to address the disconnection between food production and consumption in our nation.

The Irish Language:

The Irish language. The language used to describe this landscape for a 1,000 years is conspicuously absent from the strategy. As Michael Cronin notes in his book "Irish and Ecology"² how can we truly protect our natural environment when we have lost the words that are used to describe what we are losing. With the recent explosion of interest in Irish words as seen in the popularity of the book by Manchan Mangan "32 Words for Field," the Irish language needs to be recognized as an incredible resource relating to our food system and all Irish based Climate action. We recommend the committee for the Agri-Food Policy consult with Michael Cronin and Manchan Mangan before proceeding.

Habitat destruction

Habitat destruction is mentioned only once in the strategy. Farming is the biggest contributor to habitat destruction in Ireland, yet it is barely mentioned as an issue. This is a vast oversight. We are encouraged to see "10% of farmed area prioritized for biodiversity" as a target in the plan. Yet we worry this does not go far enough. Firstly, we need to protect the biodiversity we have left, then restore what we have lost. It is cheaper and more effective to look after what is left rather than to recreate what we have lost. Again, we recommend Regenerative Agriculture, farm diversification, planting of native species and permaculture approaches here. Acts such as the 'Noxious Weeds Act' need to be revised urgently.

Farmers must be encouraged to protect the natural environment

Current policies discourage farmers from protecting the natural environment while actively enforcing its destruction. Many farmers we spoke to have told us that they have been forced to cut hedgerow or remove scrubland under threat of losing a percentage of their single farm payment (SFP), the single largest income source for many small farmers. This is idiotic in the extreme and must be stopped immediately. No farmer should be punished for protecting biodiversity, they should be praised. Again we reiterate, all environmentally damaging subsidies must be phased out.

Circular economy

Has been mentioned a number of times in the strategy but not a single measurable goal has been given. We suggest using Kate Raworth's Doughnut Economic Model as an underpinning strategy to work towards a circular economy. We suggest consulting with the Irish Doughnut Economics Network on this as they have already been looking at doughnut economics and the food system in West Cork.¹² Soil regeneration with farm 'waste' and seed saving in-situ are other approaches we recommend.

Decolonisation

We need to clearly acknowledge the colonial roots of our food system. As we are members of the European Union, though we were oppressed for generations, we now also benefit on a colonial system of oppression and land grabbing that is rooted in violence. The only way to move to a restorative and regenerative food system is to acknowledge this deeply rooted trauma. From there we can work to address the issues caused. We need to question the underpinnings of land ownership. As a chief of the Bagobo-Obo Manobo tribe in

Cambodia asks “How can we own something that can outlive us?” We need our policies to help us reframe the truth that we are not owners of the land but stewards of our way of living with the earth. We need our policies as well as our art and literature to help us remember we are intrinsic parts of our natural world and not rulers of it. These are big questions that need to be considered. We acknowledge this is an immense challenge and again recommend the use of Restorative Practise and Non-Violent Communication as ways to broach this subject with various stakeholders and the public.

Conclusion

In conclusion the Environmental Assessment of the Draft Agri-Food Strategy to 2030 is lofty in this ambition but lacking on clear implementation strategies. Production, output, and export are the centerpiece of this strategy. The strategy aims to create sustainability for farmers by concentrating on the export market while forgoing regenerative practices that center local growers and farmers. In essence allowing other people to pay for our “green” agriculture and continuing to mask the true cost of food in Ireland. We believe this strategy is designed to work for industry, processors, and large producers. Smaller farmers, the environment and rural communities are given lip service and largely overlooked.

We, at the Green Step, believe that the environment and people should be at the center of this plan that will guide the agri-food system for the next 10 years. We heard this sentiment numerous times during our conversations with people on the ground engaging with the land and the system. We need to uplift our rural communities, farmers and food growers and ensure that they are cared for mentally, emotionally, physically and economically. Provided a decent standard of living for small farmers, revitalizing rural communities and protecting the natural environment is key. Our current mode of endless production and growth at all costs is not fit for purpose, it never was, and needs to end. The strategy needs to be flipped on its head putting the environment and small producers first, and those of processors and export a distance second.

Thank you sincerely for taking the time to read our submission. To discuss any of the points mentioned here please email thegreenstep3@gmail.com

Kind Regards,

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