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Re: Agri-Food Strategy 2030 - Review of draft Executive Synthesis and Environment chapters

Dear Tom,

Thank you for the first draft of the 2030 Agri-Food Strategy. The Environmental Protection Agency (EPA) has had the opportunity to review the drafts of the Executive Synthesis chapter and the Climate Smart Environmentally Sustainable Agri-Food Sector chapter. I set out below some overarching comments on the two chapters and I also attach the chapter drafts with marked edits and text suggestions. I trust these will assist your endeavour.

I am aware that the Strategy is subject to Strategic Environmental Assessment (SEA) and the EPA as part of a separate process are engaging in the Strategy consultation as per the requirement of the relevant legislation.

Additional detail relevant to some of our comment can also be found in our letter dated 20th July 2020 in response to your consultation on Strategic Priorities. I also refer you to Chapter 13 of the recently published State of Our Environment Report (<http://www.epa.ie/ebooks/soe2020/>, November 2020) for a comprehensive assessment of the Agricultural sector's impact on the environment. Chapters 2, 3, 5 – 8 also contain relevant assessment. Lastly, and again as part of context for this letter, I would like to recall the Terms of Reference of the Agri-Food Committee and the commitment that Ireland be an International leader in Sustainable Food Systems.

As we see it – and in the context of the two draft documents reviewed - there are two headline issues, viz:

1. Environmental challenges are being underplayed
2. The level of ambition presented is low and there are no tangible targets laid out in the plan.

There is unequivocal evidence from reports by EPA and others that the Agri-Food sector in Ireland is causing pollution and damage to ecosystems and biodiversity. The sector is responsible for approximately a third of national greenhouse gas emissions and over 99 per cent of national ammonia emissions, and is the largest significant pressure on our water resources. It is clear from our published assessments of agriculture that change is now required in the sector to ensure – and ‘assure’ - its environmental sustainability. Business as usual will not reverse these trends: systemic change is required across the agri-food system to address the challenges.

It is disappointing to see in the executive synthesis document a weak acceptance of the significance of the impact of the agri-food sector in Ireland on Climate, Water and Biodiversity. Page 4 of executive synthesis states that ... ‘the food sector is a *contributor* to Green House Gas (GHG) emissions ..., while it can also have a significant *influence* on other environmental issues such as biodiversity and water quality’. Terms like ‘contributor’ and ‘influence’ greatly under-acknowledge the known harm the sector is causing. The low levels of ambition are exemplified by Action 2 in Goal 1 in the Environment Chapter, where it states that ... ‘Bord Bia and Teagasc will collaborate to *reduce* the negative environmental impacts of agricultural production and further develop Ireland’s global reputation as a source of sustainable food production through Origin Green’. I would suggest that the word ‘reduce’ is replaced by a word that embraces greater recognition and ambition, such as ‘eliminate’.

The recurring references to success of the sector (‘increase in value and volume’,...) fails to openly acknowledge that this has been at the expense of environmental quality, emissions obligations, and biodiversity. The documents state that there will need to be ‘compromises’ and ‘trade-offs’ in relation to the different dimensions of sustainability (Economic, social, environmental). This would seem to imply that certain levels of pollution (as currently experienced) may have to be tolerated. Surely this contradicts the sustainable food leadership ambition for this strategy?

In setting out its principles (page 2 of executive synthesis) it is noted that ... ‘this Strategy recognises that the world needs to make a profound shift towards more sustainable policies and actions’. We suggest that this ‘recognition’ would be better focussed on the national challenges rather than the global situation. We would also argue that the essential ‘shift’ that is required is in land use, production and consumption practices.

We note the executive synthesis makes a statement on the ambition of being a leader in sustainable food systems that reads, ... ‘If this ambitious objective is to be achieved, Ireland’s agri-food sector will have to make significant changes in how it operates’. From an environmental perspective this commitment needs to be brought to the top of the agenda and we would suggest changing ‘significant’ to ‘fundamental’. Such a leadership role will have no integrity or reputational standing if it cannot be demonstrated that we can achieve a carbon neutral and environmentally sustainable food system within our own terrestrial and marine domains.

The strategy sets a reasonable vision and ambition at the start, but that does not appear to be reflected in the goals and actions and it is not clear how each will contribute in terms of delivering our legal obligations and commitments, or how they will interact with each other. The low-level of ambition is also reinforced by the absence of clear targets. The stated goals and supporting actions for the Strategy will need tangible and measurable targets to be articulated. Moreover, it is recommended that a mid-term review is committed to, in order to demonstrate progress towards such targets.

Specific Comments on the Chapters Reviewed

Attached you will find the two draft chapters with EPA track changes for your consideration. There are a few specific matters relating to the Climate Smart, Environmentally Sustainable Chapter that merit drawing out in this letter.

The reliance on Ag-Climatise is a vulnerability given its alignment to the 2019 Climate Action Plan. National and EU commitments have advanced since the making of the 2019 Climate Action Plan and these need to be reflected in the proposed Agri-food strategy and in an updated Ag-Climatise roadmap.

Goal 2, Action 2 in the Environment Chapter commits to undertaking a ‘national land use review’. This land use review commitment is also a commitment in the current Programme for Government. The relationship between the two commitments needs explaining. Moreover, the chapter does not adequately acknowledge the current national land cover

mapping programme being led by OSI and EPA since 2018 in collaboration with DAFM, GSI, Teagasc and others. This is expected to be completed by end 2021. Once complete, it will transform our understanding of national land cover and land use. High-resolution data, at a minimum of land parcel scale, will provide detailed information on the status of the land. It will form the basis for assessing past and future changes and will enable detailed environmental assessments and research. Integration of sectoral data will allow for a more consistent representation of national land cover and land use.

Furthermore in relation to Goal 2, Action 2, Natural Capital Accounting should be considered as a tool (rather than an end in itself) to support the land use review, for example to provide a cost benefit analysis.

With regard to Origin Green, as noted in my letter of the 20th July 2020, whilst Origin Green and other labelling schemes have played a valuable role and support efficiency ambitions, it is clear from the examination of the science that the environmental sustainability of the sector as a whole is largely not supported by the evidence. As highlighted in the EPA State of the Environment Report (SOER) 2020: "Ireland's reputation as a food producer with a low environmental footprint is at risk of being irreversibly damaged."

A key message from the SOER is that Ireland needs to have an agriculture and food sector that demonstrates validated performance around producing food with a low environmental footprint. We believe that Origin Green has a critical role in demonstrating this performance.

I trust these comments and those in the attached documents will be taken into account in any final drafting of the strategy.

Yours sincerely,



Laura Burke
Director General