

Towards a New Agricultural and Food Policy for Ireland

Recommendations for Government

A Position Paper from the
Environmental Pillar, the Stop
Climate Chaos Coalition and the
Sustainable Water Network



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Dick Coombes

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Eoin Campbell
Dick Coombes
Jef Folkerts
Wendy Love
Richard T. Mills

Design

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Table of Contents

Executive Summary.....	4
Context.....	10
Priorities and Recommendations for a New Agricultural and Food Policy in Ireland	14
01 Develop an Overarching Policy Framework Aligned with Ecological Limits and Environmental Commitments	15
02 Protect and Restore Biodiversity on Farmland	17
03 Protect and Restore Peatlands and Woodlands on Farms.....	24
04 Ensure that Agriculture Delivers its Fair Contribution of the 51% Reductions in Greenhouse Gas Emissions by 2030 Committed to in the Programme for Government	27
05 Urgently Improve Air Quality	31
06 Halt and Reverse Water Quality Decline	34
07 Support Sustainable Livelihoods and Incentivise Farm Diversification.....	38
08 Contribute to Public Health and Sustainable Consumption	43
09 Contribute Meaningfully to Food and Nutrition Security.....	45
10 Facilitate Inclusive Dialogue and Participation to Envision an Alternative Model for Agriculture in Ireland	47
About the Environmental Pillar, SWAN and Stop Climate Chaos.....	49
References	51

Executive Summary

Agriculture is by far the most significant pressure on Ireland's nature, water and air, and greenhouse gas emissions. There has been a long-standing failure to align the sector with Ireland's obligations under environmental law. Current policies that prioritise a productivist model of agriculture (i.e. focused on specialisation and intensification) lock farmers into an unsustainable commodity-driven food production system which leaves them economically vulnerable. These policies have also undermined Ireland's international reputation on food security.

In this paper, we – the Environmental Pillar, the Stop Climate Chaos Coalition, and the Sustainable Water Network – set out our policy recommendations for the Government that would deliver much needed change in Irish agriculture policy. This paper provides a foundation for a deeper discussion on what a new model of agriculture for Ireland could look like – a model that works within the ecological parameters essential to a healthy society, economy and planet.

01

Develop a Policy Framework Aligned with Ecological Limits and Environmental Commitments

The Government must ensure that Ireland's food production is in line with commitments to the Agenda 2030 Sustainable Development Goals, the Paris Agreement, the EU Green Deal and current legal obligations to protect biodiversity and water quality. It must phase out all environmentally harmful subsidies in the agricultural and food sector. This means re-orienting subsidies so that public money is channelled into the delivery of public goods. Public funding should deliver permanent cuts in greenhouse gas emissions and protect and restore water quality and biodiversity. It should also support rural livelihoods and communities. The following sections detail policy recommendations that are crucial to this framework.

02

Protect and Restore Biodiversity on Farmland

The viability of food production in Ireland depends on functioning ecosystems. Yet, agriculture is the main pressure and threat to Ireland's habitats and species. Biodiversity protection on farmland is undermined by incoherence between agriculture and biodiversity policies, and the failure by Government to enforce existing nature laws.

Approximately 33% of the agricultural area in Ireland has High Nature Value (HNV) characteristics. On HNV farmland, grazing is important for the healthy grasslands that create favourable habitat for many species. Maintaining the viability of these farming practices must be a priority for Ireland's rural development policy. Whilst intensive farms should be required to do more for biodiversity, we believe that incremental changes at farm-level will not restore ecosystem services, species and habitats as long as intensification remains the core goal of agri-policy.

Farmers should be subsidised for farm and landscape-scale ecological restoration and rewilding initiatives, where appropriate. In carrying out their proposed national land use review, the Government should examine how best to protect existing HNV systems, how best to improve biodiversity values on more intensive farms, and where and how best land use could be transformed from food production to restoration and rewilding to enhance the provision of ecosystem services.

Recommendations The Government must commit to ambitious restoration of biodiversity on farmland and at landscape scale. They must also implement the EU target of protecting (at least) 30% of land area for biodiversity by ensuring that, at the very minimum, 10% of agricultural area is under high diversity landscape features by 2030. The State should reward farmers for the public goods HNV farmland provides and ensure the socio-economic viability of rural communities. Scaling up locally adapted and financially attractive results-based agri-environment payment schemes will be important for restoring biodiversity on all farm types. As part of the proposed land use review, the Government should assess the potential for ecological rewilding at farm, catchment and landscape level.

03

Protect and Restore Peatlands and Woodlands on Farms

Land use in Ireland is currently a net emitter of greenhouse gases. This is due to on-going unregulated drainage of peatlands and organic soils because of agricultural activity, afforestation and the harvesting of peat. This can be tackled by reducing livestock grazing on organic soils. Rewetting degraded peatlands (through ditch blocking, for example) has demonstrable benefits for carbon sequestration, flood attenuation and biodiversity. The elimination of further GHG emissions from degraded peatlands must be a priority.

Agroforestry involves deliberately integrating woody vegetation (trees or shrubs) with crops. Examples include animals grazing the understory of trees and the use of trees for animal shelter, timber and/or food production. Agroforestry has multiple benefits – for example, soil biodiversity, carbon sequestration, flood mitigation, and human and animal wellbeing are all enhanced when tree cover is stable and long term.

Recommendations We call on the Government to cease the drainage of wetlands and peaty soils, and end all peat extraction. We recommend that targeted, customised supports for the management and rejuvenation of existing carbon stocks be put in place. We also call for the introduction of a suite of agroforestry measures to promote natural regeneration and ecological corridors for nature connectivity.

04

Ensure that Agriculture Delivers its Fair Contribution of the 51% Reductions in Greenhouse Gas Emissions by 2030 Committed to in the Programme for Government

Agriculture is the single largest contributor to Ireland's overall climate impact. Greenhouse gas emissions from the sector are increasing. The average dairy farm emits three and a half times more emissions than the average for beef farms, and four times more than the average for tillage farms. Current policies rely on the uptake of voluntary on-farm efficiency measures. However, these fail to adequately address the underlying drivers of emissions: rising cattle numbers and associated nitrogen inputs (fertiliser and animal feed). Further growth in the dairy sector is envisaged by Teagasc, a goal that is incompatible with climate policy. The current Government emissions reduction roadmap for the sector (AgClimatise) is not consistent with the 2020 Programme for Government commitment to reduce emissions by on average 7% per annum or 51% by 2030, as it assumes a stabilisation as opposed to an absolute reduction of methane emissions by 2030. Total emissions of greenhouse gases and nitrate/ammonia impacts must be reduced.

Recommendations We call for a revised roadmap for agri-related emissions reductions and a declining cap on total national reactive nitrogen usage. To rapidly bring down sectoral methane and nitrous oxide emissions, we recommend that regulatory, voluntary and combined measures be implemented to limit and reverse recent dairy expansion. Compensatory measures for farmers should be put in place to incentivise herd reductions.

05

Urgently Improve Air Quality

Rising cattle numbers and excessive use of nitrogen from fertiliser and animal feeds have also contributed to Ireland breaching the National Emission Ceilings Directive (NECD) limits on ammonia. A high concentration of ammonia in the air can damage ecosystems, as well as being linked to a range of pulmonary and cardiac issues in humans.

Recommendations We call for a roadmap that brings Ireland into compliance with binding commitments on ammonia. The roadmap should include implementation and enforcement measures, and funding for farm abatement measures. We also call for efforts by the Government to address barriers to compliance with the NECD, including improved mapping and monitoring.

06

Halt and Reverse Water Quality Decline

Agriculture is specifically linked with recent marked increases in water pollution, particularly in the south and southeast of Ireland. An association has been found between cattle density (i.e., as pathogen sources) and human Verotoxigenic Escherichia coli (VTEC) infection in Ireland, because of the contamination of private well drinking water supplies. Current regulations are ineffective in controlling nutrient pollution, and on-farm best practice measures to protect water quality are of limited efficacy, especially if more animals and more nitrogen inputs are permitted.

Recommendations We call on the Government to conduct risk assessments of all intensive farms (greater than 130 kg livestock manure nitrogen/ha) in sensitive catchment areas. Nitrates derogations should only be granted where it can be demonstrated that no deterioration in the aquatic environment will result. If necessary, sub-catchment areas must be zoned ineligible for certain stocking rates. A national plan to co-ordinate and support on-farm measures to intercept pollution pathways must be implemented.

07

Support Sustainable Livelihoods and Incentivise Farm Diversification

The current commodity-driven model contributes to spatial and sectoral inequalities within the farming population. Solutions include building sustainable and viable rural communities and rewarding farmers for the ecosystem services they provide. Just transition principles will help ensure that farm diversification alternatives and payments for ecosystem services adequately compensate farmers for any radical or abrupt changes.

Recommendations We call on the Government to develop a farmer and community-centred Just Transition action plan for the sector that includes diversification options with environmental co-benefits. We recommend support for the scaling up of local and indigenous nature-friendly food production, especially in cereals and pulses for human consumption, fruit and vegetables – a large proportion of which are currently imported at the expense of the indigenous tillage and horticultural sector.

08

Contribute to Public Health and Sustainable Consumption

A reduction in the intake of meat and dairy products is essential to reversing environmental decline and enabling a shift towards more sustainable agriculture. The high rates of consumption of livestock products in nearly all wealthy countries, including Ireland, and increasing global demand for livestock-based foods, threatens to undermine the United Nations Sustainable Development Goals and the Paris Agreement.

Recommendation Ireland must ensure that its food production policy promotes global health and environmental protection. National food policy should incentivise and support a greater dietary intake of organic produce and plant-based foods that are sustainably produced.

09

Contribute Meaningfully to Food Security and Nutrition

If Ireland is to be an international leader in creating a fairer, healthier and more sustainable global food system, the environmental, social and economic bases for food security and nutrition for future generations must not be compromised by Irish domestic policies.

Recommendation We call for the implementation of clear principles and oversight mechanisms, including mandatory Human Rights and Environmental Due Diligence legislation, to ensure that the commercial links to the global food economy do not undermine Ireland's international development commitments.

10

Facilitate Inclusive Dialogue and Participation for an Alternative Model for Agriculture in Ireland

A transition to a sustainable agricultural system will not be possible without ongoing multi-stakeholder dialogue. Drawing on the recommendations presented in this report, the Environmental Pillar, Stop Climate Chaos Coalition, and SWAN are committed to engaging in dialogue and discussion, with all relevant stakeholder groups, where there is genuine commitment to deliver an alternative, fairer model for Irish agriculture.

Context

The world's food and agricultural systems feed more people than ever before, supplying large volumes of key commodities to domestic and international markets. Yet, the intensification of agricultural practices across the world is causing potentially irreversible damage to the planet's living systems – its soils, air, biodiversity and water.¹ Exceeding planetary limits threatens to weaken the very support systems that are crucial to food production and ecosystem health.^{2, 3}

The COVID-19 pandemic has highlighted the potentially dangerous interactions between infectious diseases, the environment, and public health. Intensive livestock farming and land-use change are widely recognised as increasing the risk of zoonotic diseases emerging in humans.^{4, 5} COVID-19 revealed many hitherto invisible concerns associated with livestock production.^{6, 7} The global pandemic has also highlighted the risks associated with unhealthy diets (such as obesity, cardiovascular disease, some forms of cancer), poor environmental conditions, the vulnerabilities of the global food system to supply chain issues, poor animal and human welfare standards, and biosecurity risks.⁸

Preventing future pandemics calls for a planetary health perspective across the entire spectrum of public policy, including agricultural policy. Central to this response must be the preservation of ecosystems and public health, higher standards of animal health and welfare in line with legislation and best practice, and reductions of climate pollution consistent with Ireland's fair share commitment under the Paris Agreement.



Image Eoin Campbell

Here in Ireland, a productivist model of food production – characterised by intensification, concentration, and specialisation – has come to dominate farming. There has been a continued failure to align food production with environmental protection and legal obligations.^{9, 10} The EU's Common Agricultural Policy (CAP) has supported this model by subsidising food production over the other services that farmland can provide (such as regulation of soil and water quality, carbon sequestration, support for biodiversity and cultural services). Despite numerous and on-going reforms, the current CAP policy framework has failed to drive sustainability and environmental protection. Since its establishment in 1962, the CAP has driven the intensification of agriculture and has promoted the simplification and specialisation of agricultural ecosystems. This, in turn, has led to profound biodiversity loss land degradation, including over-grazing, and climate change. Limited funding goes to support climate-friendly and biodiverse farming regions.¹¹

It is also well recognised that CAP spending exacerbates income inequality within agriculture. CAP has not benefited the majority of farmers, with larger farms (that are more prone to intensification) receiving the bulk of CAP funds through direct payments linked to how much land is farmed, with minimal environmental requirements.¹² The analysis of proposals for a revised CAP post-2020 indicates that it generally retains the structure and weaknesses of the current CAP. (This paper does not address CAP in detail. It is expected that the individual coalitions behind this paper will provide a more detailed assessment of Ireland's National CAP Strategic Plans in due course).¹³

Current policies lock Irish farmers into farming practices that may be unsustainable and uneconomical in the long term, linked as they are to the vagaries of global commodity markets. These policies have also undermined Ireland's international reputation as a credible voice on food security, climate change, and environmental protection. Yet, to date, the Department for Agriculture, Food and the Marine has so far failed to offer credible alternatives that prioritise environmental sustainability.¹⁴

Irish agriculture is now at a critical juncture, and significant decisions are being made regarding the direction and priorities of the sector. This paper is published by the Environmental Pillar, the Sustainable Water Network (SWAN), and the Stop Climate Chaos Coalition – Ireland's largest environmental coalitions. It comes against the backdrop of the publication, in April 2021, by the Department of Agriculture, Food and the Marine, of the Agri-Food Strategy for 2030.¹⁵

We present our policy recommendations for the Government that, if implemented, would bring agriculture into line with Ireland's national and international obligations on climate, nature, and air and water quality.¹⁶ These recommendations are based on an integrated approach to agriculture. They recognise the synergies between climate, water and air quality, and healthy ecosystems and provide multiple benefits across climate change mitigation, biodiversity conservation and restoration, and the protection of water and air quality. For example, aligning intensive land use with ecological parameters at catchment level will mitigate climate change and deliver benefits for ecosystems, water and air quality.

The recommendations presented in this report reflect the priorities of Ireland's largest environmental coalitions for a new vision for agriculture and food production that works with and protects nature from further destruction. Our combined membership spans local and regional grassroots-based groups to faith-based, youth, development, and environmental NGOs with a nationwide and global reach. We propose, therefore, that these recommendations are used to inform a national dialogue for an alternative model for Irish agriculture and how this might best be implemented and supported by Government. We propose that, if based on an inclusive, committed process, the Government's 'Farming for Future in Ireland Dialogue' (put forward in the 2020 AgClimatise - A Roadmap towards Climate Neutrality) could provide an important space in which to progress these recommendations to chart a more sustainable pathway for Irish agriculture.

“The recommendations presented in this report reflect the priorities of Ireland's largest environmental coalitions for a new vision for agriculture and food production.”

Priorities and Recommendations for a New Agricultural and Food Policy in Ireland

01

Develop a Policy Framework Aligned with Ecological Limits and Environmental Commitments

Significantly greater ambition is now required in domestic policy to meet the objectives of the EU Green Deal,¹⁷ the EU 2030 Biodiversity Strategy, and the Farm to Fork Strategy.¹⁸ The European Green Deal comprises a set of policy initiatives by the European Commission with the aim of making Europe climate neutral by 2050 and reducing greenhouse gas emissions by 50%-55% by 2030 compared with 1990 levels. In addition to other areas, the plan also introduces new policies:

- **On restoration of biodiversity through a Biodiversity Strategy for 2030. The Strategy aims to protect nature, reverse the degradation of ecosystems and halt biodiversity loss:**
- **On agriculture through the Farm to Fork strategy. The Strategy aims to “guarantee a fair, healthy and environmentally friendly food system, whilst ensuring farmers’ livelihoods. It covers the entire food supply chain, from cutting the use of pesticides and sales of antimicrobials by half and reducing the use of fertilisers to increasing the use of organic farming”:¹⁹**

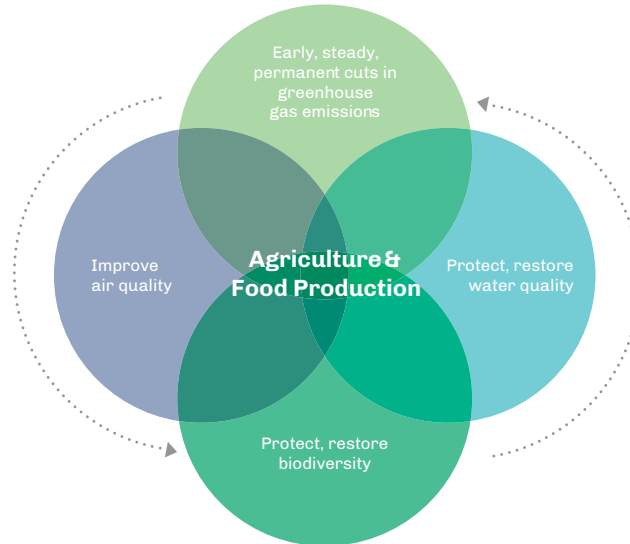
These Strategies set targets that seek to transform the EU's food system. EU member states, including Ireland, must set national values, through agri-food policy and national CAP strategic plans, for the relevant targets set out in these Strategies. This will require a detailed, target-driven roadmap that shifts Irish agriculture away from the commodity-driven, export-focused production of meat and dairy produce, and brings it in line with these EU strategies and with national obligations on climate, water and biodiversity.

The Government must ensure that Ireland's food production is in line with commitments to the Agenda 2030 Sustainable Development Goals, the Paris Agreement and current legal obligations to protect biodiversity.²⁰

This requires early, continual and permanent cuts in greenhouse gas emissions and air pollution, the protection and restoration of

water quality and biodiversity, and support for rural livelihoods and communities (Fig. 1). Achieving these goals will require that semi-state agencies, such as Teagasc, perform their functions in a manner consistent with Ireland's environmental obligations.²¹

Government Compliance with Legal Commitments
Targets, Monitoring, Enforcement
Support for Sustainable Food Production and Ecosystem Services



Fairness for Farmers, Sustainable Livelihoods, and Farm Diversification
Sustainable Consumption, Food And Nutrition Security

Figure 1 A broad outline of approaches & supports required to align agriculture with ecological limits.

We call on the Government to

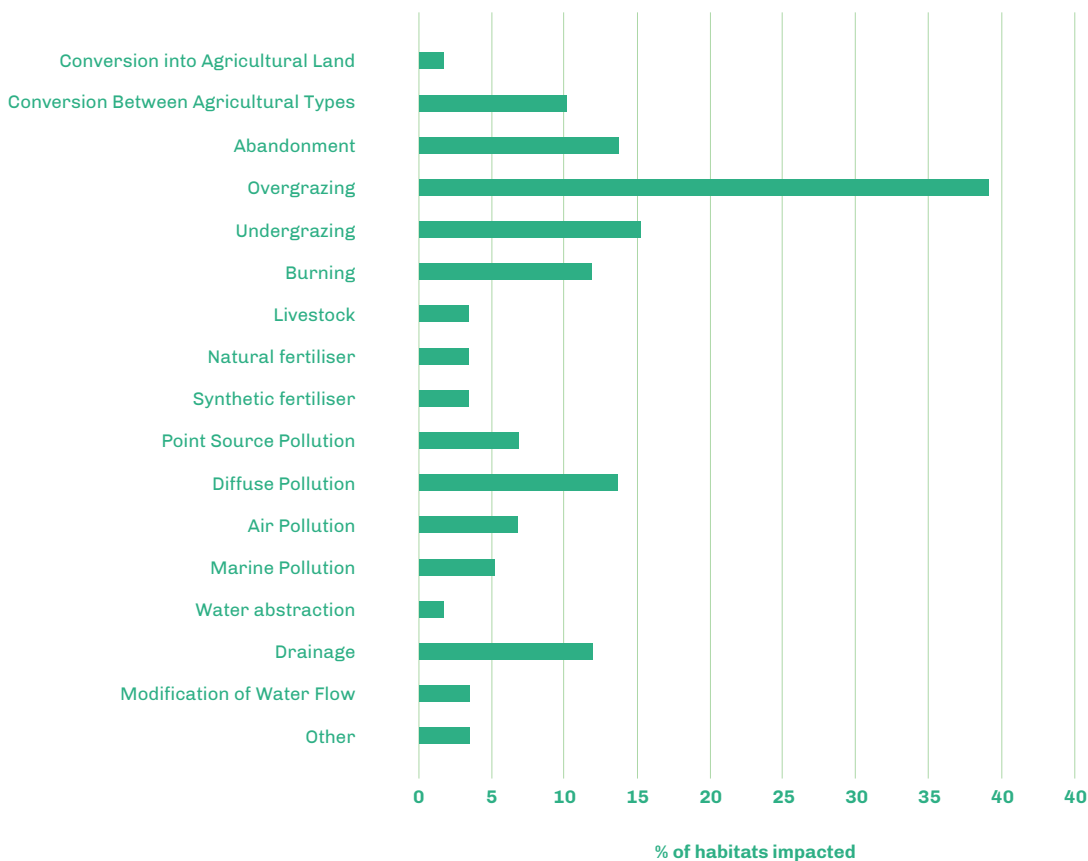
- Provide a detailed strategy for the agricultural sector, setting out how environmental targets and commitments as they relate to biodiversity, climate, soil, air, and water quality will be met and enforced, and how primary producers will be supported in achieving these targets. The roadmap for the sector must address the EU Farm to Fork and Biodiversity strategies.
- Task an independent body, ideally Ireland's Environmental Protection Agency, to establish and implement a robust monitoring framework to assess the full environmental impacts of food production at farm, catchment and national level.
- Discontinue Bord Bia's Origin Green Programme because of the conflict of interest between the marketing aims of the programme and the role of Bord Bia in producing their own sustainability assessments and metrics.
- Review the legal mandate of Teagasc (Ireland's Agriculture and Food Development Authority) with a view to reorienting its research and advisory activities towards a sustainable agro-ecological model, ensuring that environmental expertise is immediately represented on its board and management.
- Phase out all environmentally harmful subsidies in the agricultural and food sector.

02

Protect and Restore Biodiversity on Farmland

The viability of food production in Ireland depends on well-functioning ecosystems. Yet, agriculture is the main pressure and threat to Ireland’s habitats and species. Biodiversity and ecosystem function has deteriorated in recent decades to the point where agriculture is now responsible for an erosion of the important public goods and services that these ecosystems provide. Habitat fragmentation, land clearance, afforestation, widespread drainage of wetlands and damp pastures, severe declines in mixed farming, land abandonment, hedgerow removal and reduction, and increase in intensive management of grasslands have all contributed to this deterioration.^{22, 23, 24} Of Ireland’s designated sites (i.e., areas have been designated specifically to protect core areas for a subset of species or habitat types listed in the Habitats and Birds Directives), many of which are farmed, 85% have ‘unfavourable status’ with 70% of those impacted negatively by agriculture (see Fig. 2 and Fig. 3).²⁵ Ireland’s water-dependent habitats, birds and other species are declining.²⁶ ²⁷ The population of bird species such as the Curlew, Corncrake, and Lapwing have plummeted in recent decades, and one third of Ireland’s wild bee species are threatened with extinction.^{28, 29, 30}

Figure 2 Percentage of habitats impacts by agricultural pressures (Medium and High-importance pressures combined). (Source: NPWS, 2019)



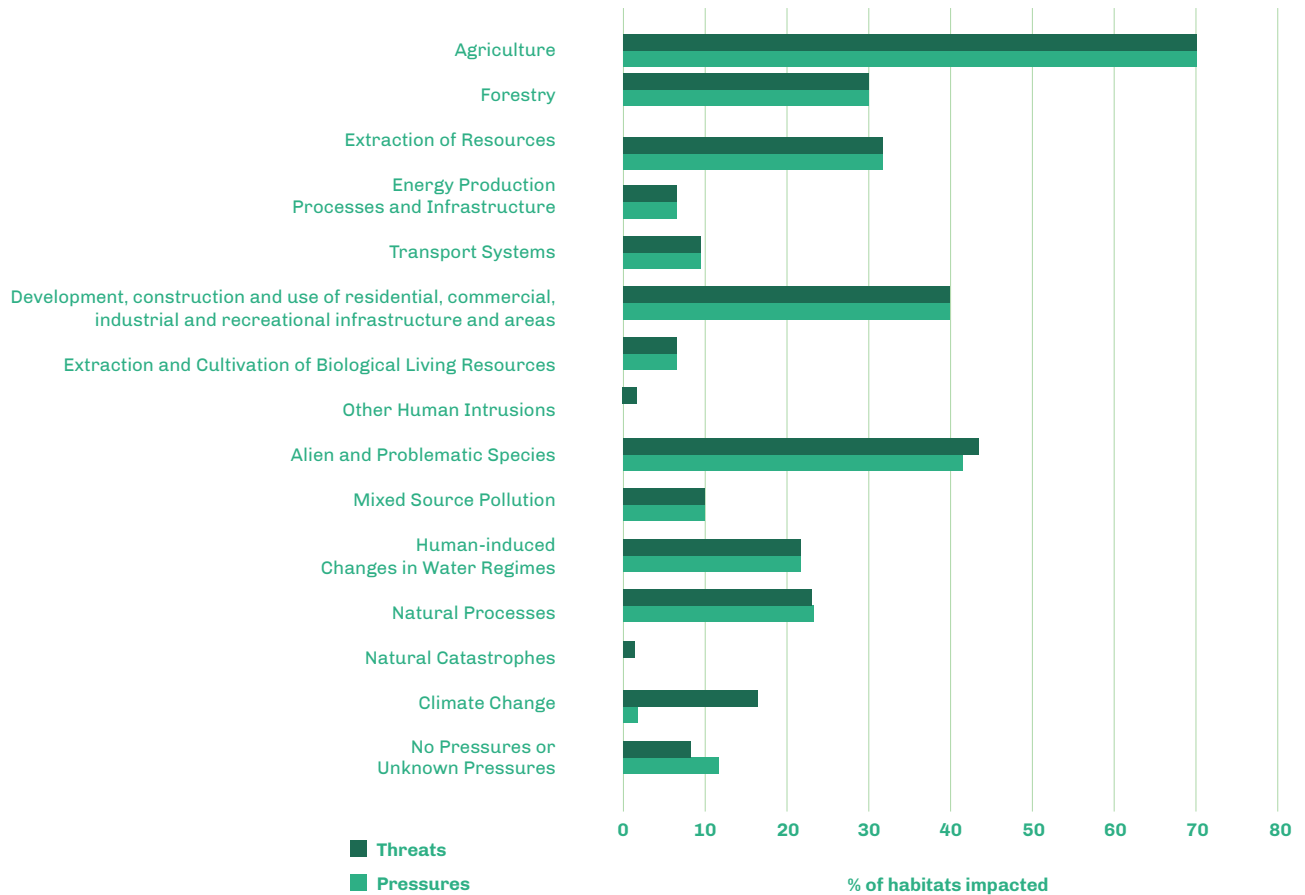


Figure 3 Percentage of habitats impacts by pressure/threat category (combined Medium and High-importance pressures/threats).

Source NPWS (National Parks and Wildlife Service) (2019). The Status of Protected EU Habitats and Species in Ireland. Volume 1: Summary Overview. NPWS, Dublin. <https://www.npws.ie/publications/article-17-reports/article-17-reports-2019>

The protection and enhancement of biodiversity on farmland, and more broadly at regional and national scale, is impeded by an incoherence between agriculture policy and biodiversity policy, disincentives to make space for nature on farms, and the consistent failure by Government to enforce existing national and EU nature laws. In addition, because of serious design flaws in national agri-environment schemes, current monitoring and evaluation systems for farm biodiversity actions do not capture the true impact of these schemes on biodiversity.

Complex EU land eligibility rules for Pillar 1 payments under the CAP have had perverse effects on the ground, causing farmers to destroy habitats simply to retain eligibility for payments, often on farms with the most ecologically sensitive systems. Farmers can find themselves penalised for keeping certain biodiverse landscape features on their land (such as ponds, hedges, shrub patches, for example) as a result of poorly conceived rules and their interpretation by national and EU authorities.³¹

Ireland as a whole has a mixture of semi-natural vegetation and more intensive food production areas. The range of intensities of farming in Ireland and the spatial diversity of land types mean that measures to protect biodiversity on farmland need to be locally adapted within a broader framework of integrated catchment/landscape management initiatives. The following subsections present scenarios for biodiversity on farmland under different management regimes.

Protecting High Nature Value Farming

Ireland's grassland and hedgerow biodiversity has assembled over time in conjunction with diverse, low-intensity mixed farming with minimal to zero fertiliser inputs. Because of their landscape and socio-cultural value, and high levels of biodiversity, these systems are known as High Nature Value farmland ((HNvf) (Fig. 4).^{32,33} It is estimated that approximately 33% of the agricultural area in Ireland has HNV characteristics, approximately half of this is within the Natura 2000 protected areas network.³⁴

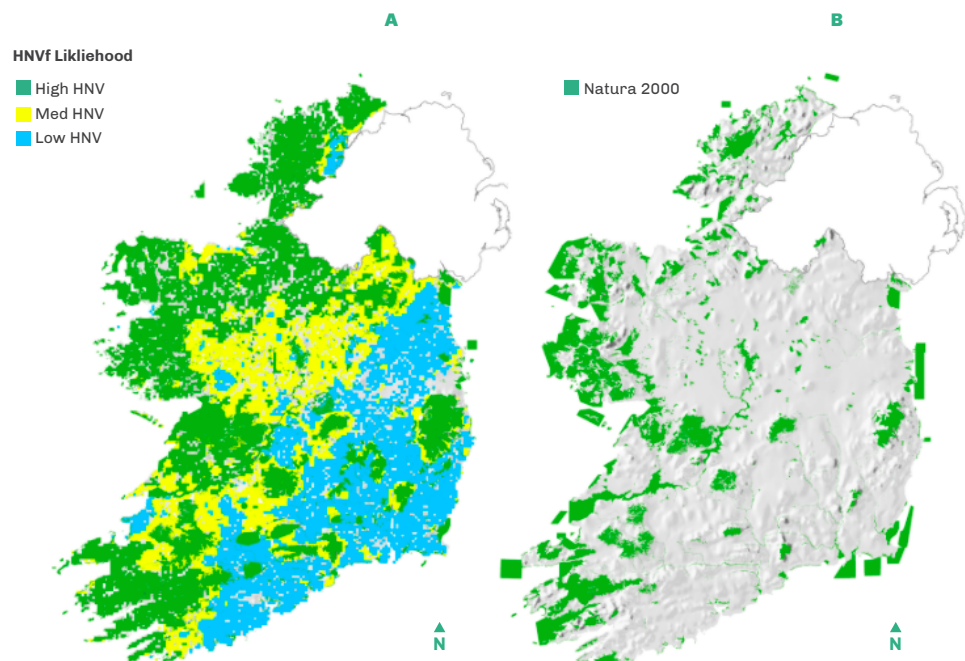
Many HNV landscapes across the EU are at risk of ecological degradation.^{35,36,37} Past and current agricultural subsidies and conservation measures have mainly failed to safeguard HNV farmland and the respective farming systems, and a combination of social, economic and environmental pressures has led to either farmland abandonment or agricultural intensification.

Many HNV farms are economically vulnerable. Farmers are highly dependent on direct payments and off-farm employment for income, but they are not recognised or rewarded for the ecosystem services they provide. This is both a policy failure and an example of market failure.³⁸

Once lost, it can be difficult to reinstate HNV management, especially in areas of rural depopulation, and because of global environmental change, there may be a limited timescale in which it is possible to achieve restoration goals to a former ecological state. Supporting and maintaining the viability of HNV farming must be a priority for Ireland's rural development policy. Vibrant rural communities are needed to help protect and ensure the socio-ecological viability of this type of farming. Ensuring this requires: improving basic services and infrastructure in rural communities, providing new economic opportunities for HNV related goods and services, and

Figure 4 (a) Extent and distribution of high nature value farmland in the Republic of Ireland. (b) Natura 2000 network in the Republic of Ireland.

Source Moran, J., D. Byrne, J. Carlier, B. Dunford, J. A. Finn, D. Ó hUallacháin, and C. A. Sullivan. 2021. Management of high nature value farmland in the Republic of Ireland: 25 years evolving toward locally adapted results-orientated solutions and payments. *Ecology and Society* 26(1): 20. <https://doi.org/10.5751/ES-12180-260120>



empowering farmers and rural communities through capacity building and innovation, and rewarding farmers for the delivery of ecosystem services. Restrictions on certain land use change may be necessary to deter intensification. A mix of conditionality rules along with environmental funding schemes such as CAP eco-schemes, and incentives to bring stocking densities in line with the specific ecological parameters of the system may be required.

Recently established targeted, results-based agri-environment schemes have shown much-needed promise in the fight to save species from extinction and improve habitats. With adequate investments, Ireland should be significantly expanding results-based schemes across all farm types (i.e., HNV and more intensive systems) including where there exists a clear relationship between biodiversity protection and other environmental targets, e.g., related to water and soil quality, carbon storage and sequestration. The protection and reintroduction of structural elements (such as ecological corridors, ponds and wetlands, hedgerows, for example) to increase habitat heterogeneity should be part of these schemes.

Increasing Biodiversity Potential on Intensive Farms

Farms with a higher level of input and output per unit of agricultural land area have considerable impact on biodiversity and ecosystem health directly (through local land use changes on-farm and at landscape scale) and indirectly (through feed production processes and associated land conversion off-farm).³⁹ The reliance on monoculture pasture and high fertilizer input, as well high levels of nitrogen pollution means that intensive systems present risks to biodiversity and ecosystem stability. This is especially in traditionally biodiverse grasslands and wetland areas. Across Europe, intensification has resulted in a decline of structurally diverse landscape elements, such as ecological corridors and hedgerow networks, where natural habitats have become increasingly fragmented.⁴⁰ As a result, this pressure undermines the capacity of the land to support other functions and ecosystem services.

Studies from across Europe show that if a minimum of 10-14% of agricultural land were left to nature, then birds, and thus other wildlife, would recover. Targets within the EU Biodiversity Strategy aim for at least 30% of EU land area to be protected and connected through ecological corridors, and at least 10% of agricultural area to have high-diversity landscape features, such as hedges and ponds. As highlighted earlier in this report, these targets need to work in tandem with the Farm to Fork Strategy and the CAP post 2020. If Ireland preserved all farmland landscape features, either through targeted incentives and schemes, or via legal designation, to achieve this 10% high diversity target, it would help progress the overall EU target of 30% protected lands. Climate mitigation measures such as multi-species swards, hedgerows or agroforestry are clearly good for biodiversity at a field or farm scale. At a landscape and catchment scale, ecological diversity and connectivity should be encouraged through the conservation of ponds and wetlands, mixed species woodlands and other natural and semi-natural habitats.



Image Richard T. Mills—
Courtesy BirdWatch Ireland

Although important ecological features at farmland and landscape level should be protected from intensive agriculture, incremental changes at farm-level will not deliver for biodiversity if intensification remains the core goal of agri-policy. Recommendations – on regulating nitrogen inputs and reducing herd size and stocking density, on-farm diversification, and reducing the demand for meat and dairy consumption – presented in subsequent sections of this report will also deliver biodiversity gains on Irish farmland.

Ecological Restoration and Rewilding

Ecological restoration aims to return severely degraded ecosystems to a former ecological state, restoring its ecosystem function. Rewilding gives wildlife and natural processes the space and time to recover to increase ecological resilience, with the focus on process rather than a desired outcome.⁴¹ Both approaches represent a managed withdrawal of direct human management of nature (depending on the scale of the area, i.e., small farmland areas, for example, may require much more intervention to replace the ecological processes that require large areas of land to operate naturally). There is now a growing discussion among conservationists about the need to restore and rewild degraded ecosystems by leaving land free from livestock. In future, the implementation and enforcement of existing legislation will need to take place alongside additional efforts (e.g., outside of protected areas) to halt wide-scale biodiversity loss.

Restoration and rewilding could be used where land has been abandoned or severely degraded due to agricultural practices⁴² (for example, overgrazed upland regions), or where the ecological, economic and societal value outweigh the benefits of keeping land under food production (supported by subsidies).^{43, 44, 45} Land owners could be subsidised – by channelling public money into the delivery of public goods – for keeping land not for the primary focus of food production and agricultural activity, but for farm and landscape-scale ecological restoration and recovery.⁴⁶ The local implementation of rewilding initiatives, however, must be based on a scientifically robust rationale, and an assessment of the potential ecological and social costs and benefits.⁴⁷

In undertaking their proposed national land use review (committed to in the 2020 Programme for Government), the Government should examine how best to protect existing HNV systems, how best to improve biodiversity values on non-HNV farmland, and where and how land use could be transformed from food production to restoration and rewilding. An important part of this review will be the need to consider how best to operationalise land management regimes in policy and practice in cooperation with farmers and local communities.

We call on the Government to

- Urgently develop new, and fully implement all existing conservation and restoration plans for habitats, threatened species and protected areas at landscape/catchment scale in line with EU Biodiversity Strategy targets.
- Progress the EU target of protecting (at least) 30% of land area for biodiversity by ensuring that, at the very minimum, 10% of agricultural area is under high diversity landscape features by 2030. This can be achieved by working collaboratively with farmers and ecologists to identify areas that can support natural regeneration, ecosystem connectivity and functioning at scale. Given the poor condition of Ireland's biodiversity, the Government must commit to a much higher restoration target.⁴⁸
- Reward farmers for the public goods HNV farmland provides and improve its viability by promoting recognition and demand for these goods and services.
- Scale up locally adapted results-based agri-environment payment schemes on all farm types. Scheme payments must be financially attractive⁴⁹ and supported by improved monitoring and evaluation systems for biodiversity actions and outcomes. Schemes should support biodiversity, carbon sequestration and water quality including active rewetting and maintenance of bogs, riparian planting, agroforestry, continuous cover forestry and hedgerow conservation.

- Use the national CAP Strategic Plan to select instruments and measures that best support the delivery of public goods. Review land eligibility criteria under CAP with a guarantee of payments for space for nature and high quality, connected ecosystems on all farms. The primary eligibility criterion should be that land is subject to positive environmental management in a way that ensures maintenance of public goods.
- Significantly tighten and enforce the regulations on land restructuring, habitat removal and drainage of wetlands. Introduce bespoke legislation to protect hedgerows, including a requirement for consent from the relevant agencies for all proposed hedgerow removal.
- Significantly bolster farm advisory services with appropriately skilled ecologists to work with farmers to ensure that desired outcomes are achieved for biodiversity and water quality. More specifically, expand expertise and peer-to-peer learning opportunities on the management of hedgerows, with specialised training provided in best practice hedgerow management techniques.
- Assess the policy constraints and opportunities for ecological restoration and rewilding at farm, catchment and landscape level. This assessment should include an analysis of the trade-offs between food production and provision of ecosystem services, and where there are win-win opportunities for the environment and rural communities. Identify funding mechanisms to reward farmers for farm-scale rewilding initiatives, and support the piloting of well-monitored and evaluated rewilding initiatives at multiple scales.

“Introduce bespoke legislation to protect hedgerows, including a requirement for consent from the relevant agencies for all proposed hedgerow removal.”

03

Protect and Restore Peatlands and Woodlands on Farms

Ireland needs to take a holistic approach to agricultural land use to meet the need for food and fibre, and to protect and restore ecosystems and to provide public goods.

The Restoration of Peatlands and Soils

Wetlands in Ireland are a significant source of carbon emissions due to ongoing and unregulated drainage of peatlands and organic soils for agriculture and forestry, and peat harvesting. Peatlands contain up to 75% of Ireland's soil carbon, with carbon dioxide emissions associated with changes in soil temperature, vegetative cover and water table level. Wetlands (such as turloughs, fens and swamps, callows, ponds, and wet grasslands, for example) are important habitats on farms, providing habitat diversity and ecosystem services.

Agricultural soils are one of the largest peatland categories. Many peatlands, including those protected under national and European legislation, are in poor condition at present. Just 18% of peatlands are classified as 'near-natural' and of conservation value, whilst 82% are classified under other land uses that involve some form of drainage. Agricultural activity is attributed to 28% of this area of peatland.⁵⁰ Annual drainage emissions from histic and humic soils related to agriculture equate to over half of Ireland's agricultural emissions.⁵¹ ⁵² This contrasts with the widespread misreporting of the carbon sequestration potential of farming practices in Ireland.

Managing soils to minimise GHG emissions and depletion must be a priority in agricultural policy. A decline in soil organic matter is one of the major factors in declining soil biodiversity.⁵³ Given that biodiversity is positively linked with soil functioning and land productivity, farming practices that increase soil organic matter should be encouraged to aid carbon sequestration. Such practices would result in an increase in the quality and productivity of agricultural soil, reducing the need for nitrogen fertilisation.⁵⁴ Rewetting of nutrient poor organic soils, coupled with grazing reduction, has proven benefits for carbon sequestration. Increasing soil organic matter also improves water retention, which in turn helps agricultural land to become more resilient to flooding and drought.

Although the implementation of the 2019 Climate Action Plan and the 2020 AgClimatise strategy will help to reduce carbon losses from peatlands and grasslands, both land-use categories will remain significant sources of emissions unless more ambitious action is taken.

The elimination of GHG emissions from degraded peatlands should be a priority for the Government. Improved management and protection of existing carbon stocks, such as peatlands, could generate income under agri-climate environmental measures in national CAP strategic plans.⁵⁵

It is important to emphasise however, that due to the lack of verifiable and permanent carbon storage, offsetting is not a reliable policy for managing agricultural emissions. For example, trees may eventually be harvested or burned, and climate-induced drought may affect rewetted soils or bogs. Restoration for the purpose of generating carbon credits for the voluntary carbon market or for trading under the provisions of Article 6 of the Paris Agreement is not a reliable policy that supports Ireland's domestic emission reduction obligations under the international climate law.^{56, 57} While carbon sequestration must play an important role in agriculture and land use policy, it cannot be a substitute for absolute emission reductions from the sector.⁵⁸ The State should not support, develop or encourage any carbon market or offsetting project that uses land-based credits until we have as a country contributed our fair share of mitigation effort under the Paris accord.



Image Dick Coombes

Woodlands & Agroforestry

Only 2% of Ireland's land mass consists of semi-natural and native woodland cover. Most of this is recently planted or naturally regenerated, much of it is isolated, fragmented and in far from satisfactory condition. Healthy woodlands provide multiple environmental and social benefits – for example, carbon sequestration, natural organic soil improvement, flood mitigation, potential benefits of related farm diversification; local employment, and enhancement of human and animal well-being from shade, shelter, and aesthetic value.

Recent evidence points to a high level of deforestation in privately owned broadleaf dominated forest, with 52 deforestation events (between 2000 and 2012) taking place in long-established or ancient woodlands.⁵⁹ Raising awareness among landowners of the

regulatory framework around tree felling and the penalties for the illegal felling of trees should be a priority.^{60, 61}

Forestry and farming are not mutually exclusive activities. They can work together to support ecosystems, people and the rural economy. Agroforestry is the practice of deliberately integrating woody vegetation (trees or shrubs) with crops with a view to, for example, reducing soil erosion. Agroforestry also describes the practice of letting animals graze at the understory of trees and where the trees are used for animal shelter, timber and/or food production.⁶² There is evidence to show greater floral, faunal and soil microbial diversity on agricultural land that includes agroforestry, in comparison to monocropping and some forest systems.⁶³

Agroforestry can also open up opportunities for diversification (farm-woodland guided walks, for example). These benefits are enhanced when agroforestry is stable and long term and managed manually with selective felling. Current agroforestry measures are limited in scope and have the production of timber as the main objective. Stringent timber production criteria and a replanting obligation present obstacles to farmers adopting agroforestry measures.

We call on the Government to

- Cease the drainage of wetlands and peaty soils,⁶⁴ and cease all peat extraction. Identify areas of agricultural land that require better management of existing carbon stocks and where immediate rewetting is possible. Put in place targeted, customized support for the management and rejuvenation of existing carbon stocks.⁶⁵
- Ensure that measures to promote soil carbon sequestration, rewetting of grasslands and afforestation are done for sound environmental reasons and not with a view to generating unreliable and impermanent carbon offsets.
- Introduce a full suite of agroforestry measures focused on a variety of species and a continuous cover management model to promote natural regeneration and ecological corridors for nature connectivity.⁶⁶ Prioritise the protection and restoration of ecological corridors of linear native woodlands and hedgerows that connect existing fragments of semi-natural, native, and ancient woodlands.
- Prioritise the development of a new sustainable forestry model that is in line with EU law, and increases the area of woodland and continuous tree cover. This model must be based on appropriate afforestation in the appropriate place and the implementation of environmental safeguards to protect water sources and biodiversity. It is critical that physical ecological survey and assessment is undertaken prior to afforestation of sites.

04

Ensure that Agriculture Delivers its Fair Contribution of the 51% Reductions in Greenhouse Gas Emissions by 2030 Committed to in the Programme for Government

Agriculture is responsible for 35% of Ireland's annual greenhouse gas emissions and is the single largest sectoral contributor to Ireland's overall climate impact (Fig. 5).

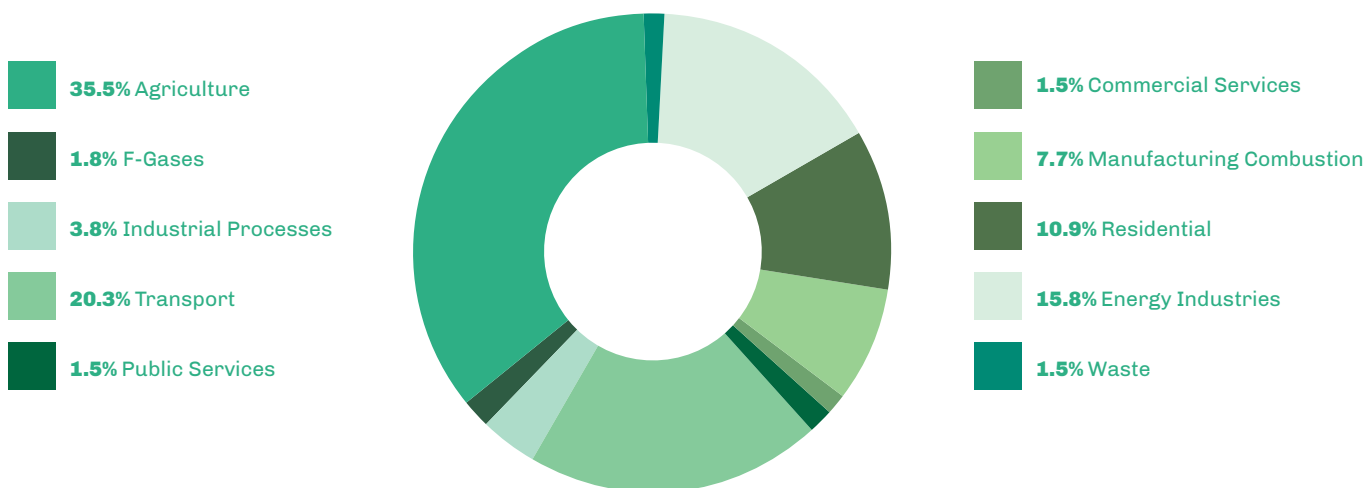
The EPA states in its most recent emission projection reports that emissions from the sector are increasing, and that they are driven by rising dairy cattle numbers and associated nitrogen inputs.⁶⁷

The dairy sector currently contributes half of all of Ireland's agricultural greenhouse gas emissions and has been driving the increase in agricultural emissions in recent years. Recent CSO data shows that there was a 41% increase in dairy cows from 2010 to 2019, making Ireland an outlier in comparison to other EU member states.⁶⁸

It is worrying to note that the Teagasc dairy strategy to 2027 envisages yet further growth in herd numbers, a goal that is totally incompatible with climate policy.⁶⁹ If current projections for the sector are realised in terms of animal numbers and milk and

Figure 5 Sectoral contribution to overall GHG emissions in 2019

Source EPA (Environmental Protection Agency). (2020b). Ireland's Provisional Greenhouse Gas Emissions 1990-2019. EPA, Wexford, Ireland.



beef output, there will be an inevitable increase in absolute greenhouse gas emissions, regardless of whether on-farm efficiencies are implemented.

Total emissions of greenhouse gases and nitrate/ammonia impacts must be reduced. However, reliance on the uptake of voluntary efficiency measures drawn up by Teagasc and the more recent AgClimatise Roadmap (published in late 2020), fail to adequately address the underlying drivers of emissions: cattle numbers and nitrogen inputs (fertiliser and animal feed). Nor is the AgClimatise roadmap consistent with the Programme for Government commitment to reduce emissions by on average 7% per annum or 51% by 2030, as it assumes a stabilisation rather than an absolute reduction of methane emissions by 2030.⁷⁰

Climate action policies for the agricultural sector have to date been based on assumptions about farmers' responses to theoretical cost savings from voluntary mitigation and efficiency measures. However, even if fully implemented, these measures will not address the multiple environmental impacts of the sector, nor can they be scaled up quickly enough to deliver the required emission reductions in a timely fashion.^{71, 72} Moreover, the focus on cost efficiency falsely assumes that if farms are 'efficient' in the sense of maximising outputs per unit of input (feed and fertiliser), they are environmentally sustainable. This approach ignores greenhouse gas impacts and other land-use changes that, taken together, would show much higher environmental impacts per unit of output than are currently reported.

In fact, the only important measure of climate and air pollution action is absolute, instead of relative, annual emissions as reported in the National Inventory of GHGs published annually by the EPA, therefore efficiency measures are a distraction. Agricultural emissions of methane, nitrous oxide and ammonia have been increasing steadily since 2011 due to dairy expansion and greatly increased nitrogen inputs, with only a minimal reduction in beef cattle numbers.

Requiring herd reductions from beef farmers will not by itself address the water and biodiversity impacts from the dairy sector, and may even lead to rebound effects as more land becomes available for silage production for dairy cows.

The Climate Change Advisory Council undertook a special review of agriculture, forestry and land-use in 2019 but assumed in its scenarios that no herd reductions would take place in the dairy sector, thus ignoring the growing ecological burden of intensive dairy farming in many areas of the country. Getting cattle numbers down simply by sacrificing the beef sector is not a just transition for Irish agriculture: no farmer should be left behind, and no one part of the country should be turned into a 'sacrifice zone' to keep profitable dairy farmers in business. Farmers must be supported with policies that provide both stable incomes through diversification, and also facilitate reduced stocking rates with decreased inputs.⁷³



Image iStock.com/Wendy Love

Without substantial and sustained reductions in agricultural methane over the next decade, it will not be possible to meet current national and EU climate targets. It is not expected that agricultural emissions will fall as fast as emissions in other sectors of the economy over the next decade. It is expected, however, that there must be substantial year-on-year reductions in absolute emissions from agriculture. For the Government to allow one economic sector in society — a sector which represents one-third of Ireland's emissions — to simply continue business-as-usual, and insist that the rest of the economy reduce its emissions by three-quarters to achieve the overall 51% target for 2030 is highly unfair and impractical. Steadily and permanently reducing agricultural methane in the near-term with annual reductions in the order of 3-5% from 2022 to 2030 will be necessary to limit overshoot of Ireland's national 'fair share' of the remaining global carbon budget aligned with meeting the Paris Agreement commitments.⁷⁴

Policies that support carbon sequestration, though highly important for carbon storage in trees, soils, hedgerows and wetlands, are neither reliable nor permanent methods to offset greenhouse gas emissions from agriculture or fossil fuel combustion. Relying on carbon storage or anaerobic digestion technologies carries risks, uncertainties and high costs.

Changing the types and quantities of foods we consume could also have a significant impact on emission reductions. Shifting diets in

line with health recommendations would have the positive benefit of reducing GHG emissions and freeing up land for other uses.⁷⁵ However, it needs to be acknowledged that while there is potential for emissions reductions from a shift towards plant-based diets among Irish consumers, a reduction in the consumption of animal-sourced food in Ireland is unlikely to have a significant impact on Ireland's total agricultural greenhouse emissions. This is due to the fact that most agricultural commodities are produced for export markets. For this reason, the Government, in its approach to agriculture and food production, must address the total impacts of all food production in Ireland on a territorial basis regardless of where the food is eventually consumed.

We call on the Government to

- Publish a revised roadmap for agri-related greenhouse gas emissions reductions that sets out a time scale to achieve, as a minimum, compliance with EU and national law, including the forthcoming Climate Amendment Bill, by 2030, and an implementation and enforcement schedule that can be monitored on an annual basis.⁷⁶
- Put in place a declining cap on total national reactive nitrogen (and phosphorus) usage based on an assessment of the total amount and rate of nitrogen inputs from fertiliser and animal feed that is appropriate and sustainable for climate action, air and water quality to bring usage down to 2011 nitrogen inputs levels (296 ktN) within three years, followed by a more gradual, steady reduction thereafter.⁷⁷
- Consult with stakeholders and devise regulatory, voluntary and combined measures based on international best practice to limit and reverse recent expansion in the dairy sector by rapidly bringing sectoral greenhouse gas emissions back to 2011 levels by 2025 or as soon as feasible thereafter. Such measures should include a requirement for dairy farmers to reduce their herds and stocking rates to the level consistent with local environmental, and national ammonia and climate constraints, with immediate priority given to farms in sensitive catchment areas.
- Put in place compensatory measures to facilitate and incentivise herd reductions and diversification in the beef suckler and finishing sectors. Farmers relying on CAP payments for the bulk of their farm incomes should not be financially worse off by implementing herd reductions on a gradual basis.⁷⁸

05

Urgently Improve Air Quality

Ireland is in breach of the National Emission Ceilings Directive (NECD) on ammonia, with agriculture dominating emissions of ammonia (99%) because of animal manures and nitrogen fertiliser (Fig. 6).⁷⁹ The EPA has identified this breach as being largely due to increasing cattle numbers under Food Wise 2025. Beef and dairy farming represent 51% of these emissions, and 4% and 3% are from the rearing of pigs and poultry, respectively.⁸⁰ These figures exclude emissions from the spreading of animal manure from cattle, pig and poultry (30% of national total). Due to the intensive nature of pig and poultry production, their ammonia contributions may have a higher impact locally, especially with unlicensed intensive pig and poultry farms acting as ammonia hotspots in some parts of Ireland.⁸¹

Figure 6 Total ammonia emissions and projected emission figures (Source: EPA, 2020).

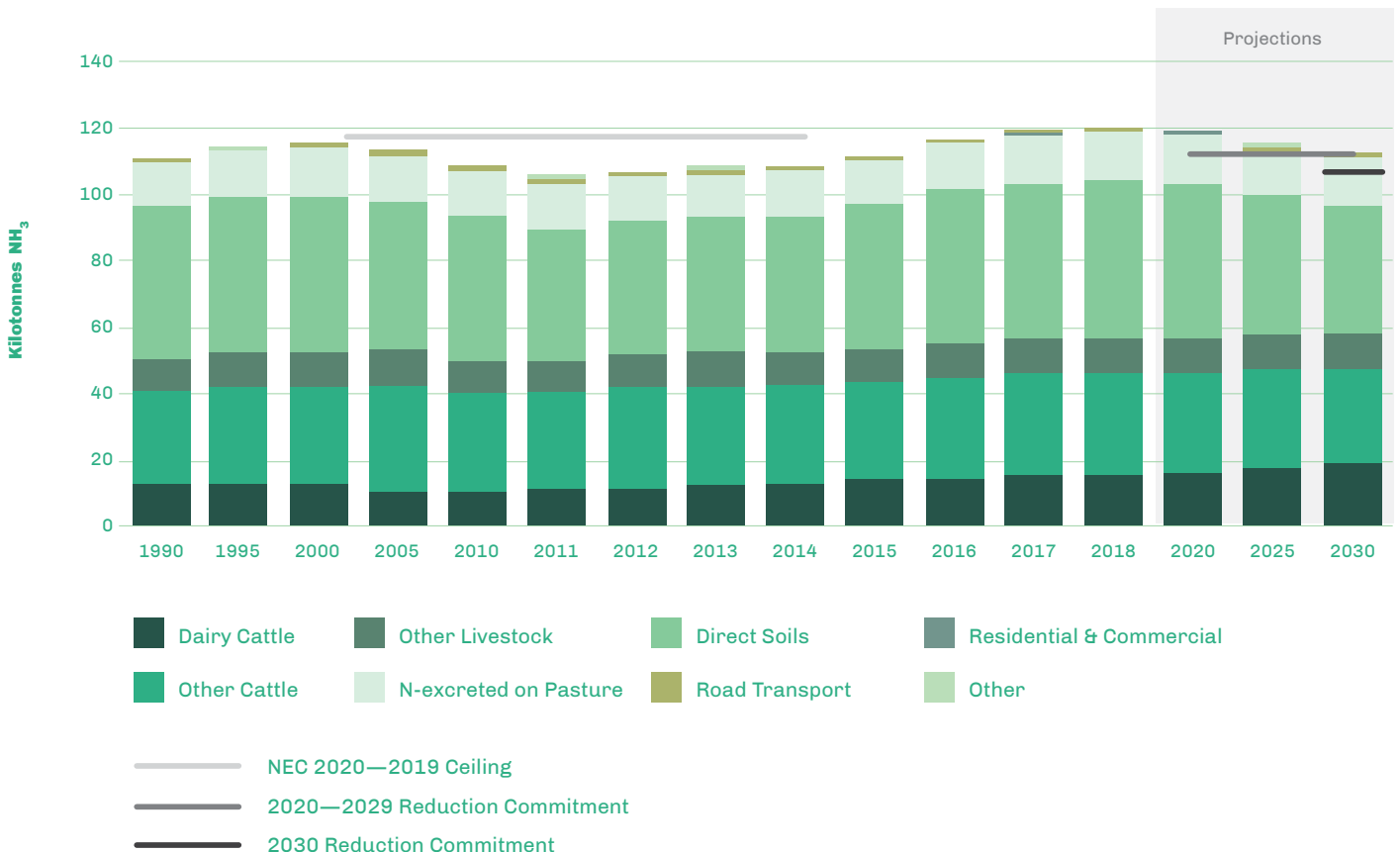




Image iStock.com/Jef Folkerts

A high concentration of ammonia in the air can also cause negative changes in ecosystems, especially nitrogen-sensitive habitats, such as semi-natural grasslands and peatlands.⁸² Particulate matter resulting from the reaction of ammonia with other pollutants has been linked to a range of pulmonary and cardiac issues in humans. Research specific to Ireland is required to assess the impacts of ammonia on human health, especially on the prevalence of asthma in children.

The Government's Code of Good Agricultural Practice (which is a range of voluntary yet cost-prohibitive measures that farmers can implement) is insufficient for achieving reductions in ammonia emissions.^{83, 84} The Government currently relies on AgClimatise, which adopts this Code, as the instrument to reduce ammonia emissions.

The most recent analysis (at the time of writing) of the costs of ammonia abatement in Irish agriculture expects that compliance with NECD obligations can be achieved, conditional upon the full uptake of all abatement measures. Notably, the Baseline Scenario adopted in this analysis assumes a decrease by 2% in the overall cattle population between 2018-2030. This projection differs from an earlier analysis, which assumed an increase of 6% in cattle numbers up to 2030, to reflect the most likely trajectory of Irish agricultural activity. Overall, considering the voluntary and unfunded nature of abatement measures, full implementation is highly unlikely, and Ireland will continue to breach binding ammonia limits for both 2020 and 2030.^{85, 86, 87}

We call on the Government to

- **Prioritise the establishment of a credible, integrated roadmap that delivers compliance with the NECD. Include in this pathway mandatory implementation and enforcement measures, and substantial funding streams for specific farm abatement measures and monitoring of impacts.**
- **Address the current barriers to compliance with the NECD, including the need for extensive mapping and monitoring of ammonia concentrations and the ecological impacts.**
- **Implement an immediate ban on splash plate slurry spreading within the impact zone of sensitive Natura sites (such as bogs, heaths and species rich grasslands), and within 5.2 km of those sites.⁸⁸**
- **Task the EPA to thoroughly critique, via the integrated pollution control licencing process, and undertake a cumulative assessment of projected ammonia emissions from intensive pig and poultry production, with a view to determining the impact on Ireland's efforts to achieve its NECD obligations.**

“Implement an immediate ban on splash plate slurry spreading within the impact zone of sensitive Natura sites (such as bogs, heaths and species rich grasslands), and within 5.2 km of those sites.”

06

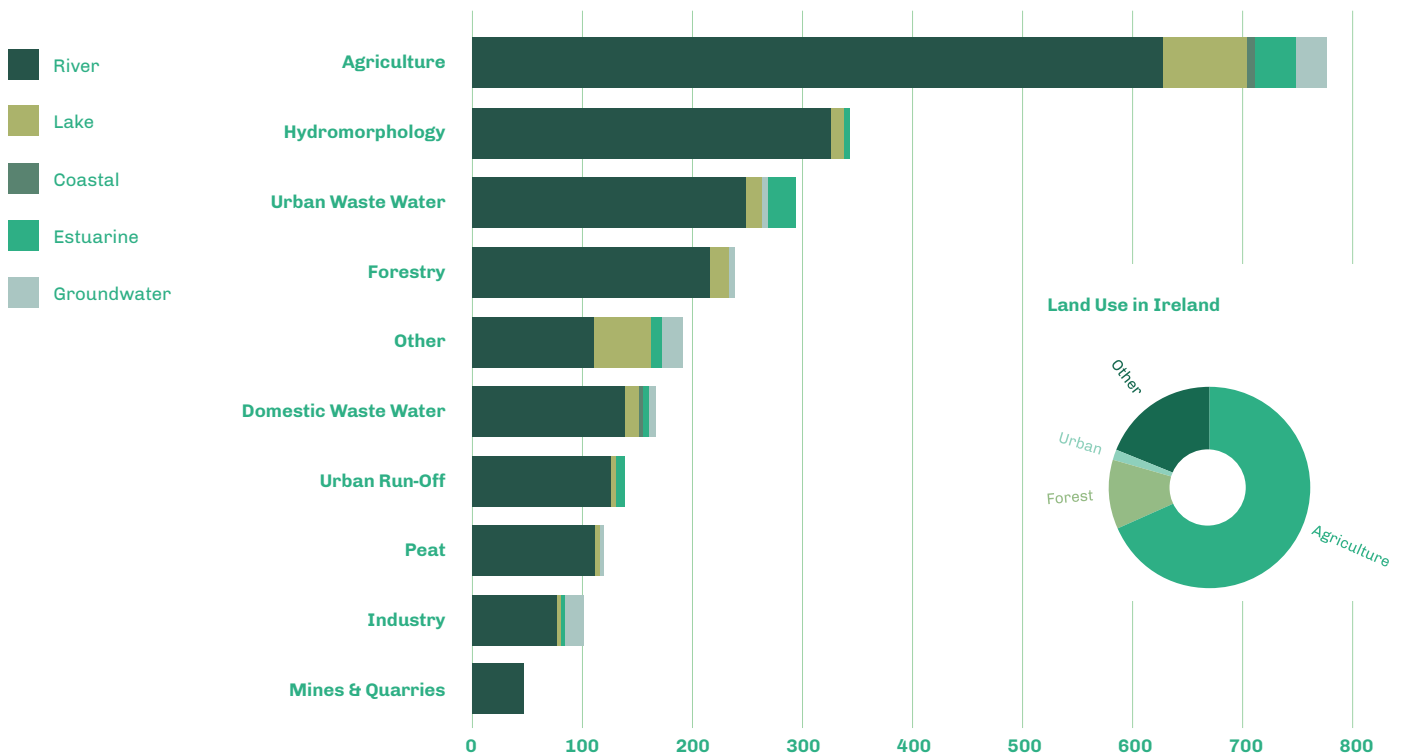
Halt and Reverse Water Quality Decline

Agriculture is by far the most significant pressure on the Irish water environment,^{89, 90, 91} and the sector is responsible for a large proportion of water bodies failing to achieve good status as required by the Water Framework Directive (WFD) (Fig. 7 and 8).⁹²

Agriculture is specifically linked with recent marked increases in water pollution from nutrients, particularly in the south and southeast of Ireland (Fig. 8)^{93, 94} elevated pesticide levels,⁹⁵ declining species richness and abundance,⁹⁶ physical alterations to water bodies, and widespread unregulated wetland and riparian drainage causing sedimentation impacts.⁹⁷

In addition, Ireland reports one of the highest crude incidence rates of Vero toxigenic Escherichia coli (VTEC) infection in the European Union, with evidence showing a link between infection risk, private well use and cattle density.⁹⁸

Figure 7 Significant pressures on Ireland's aquatic environment (Source: EPA, 2020)



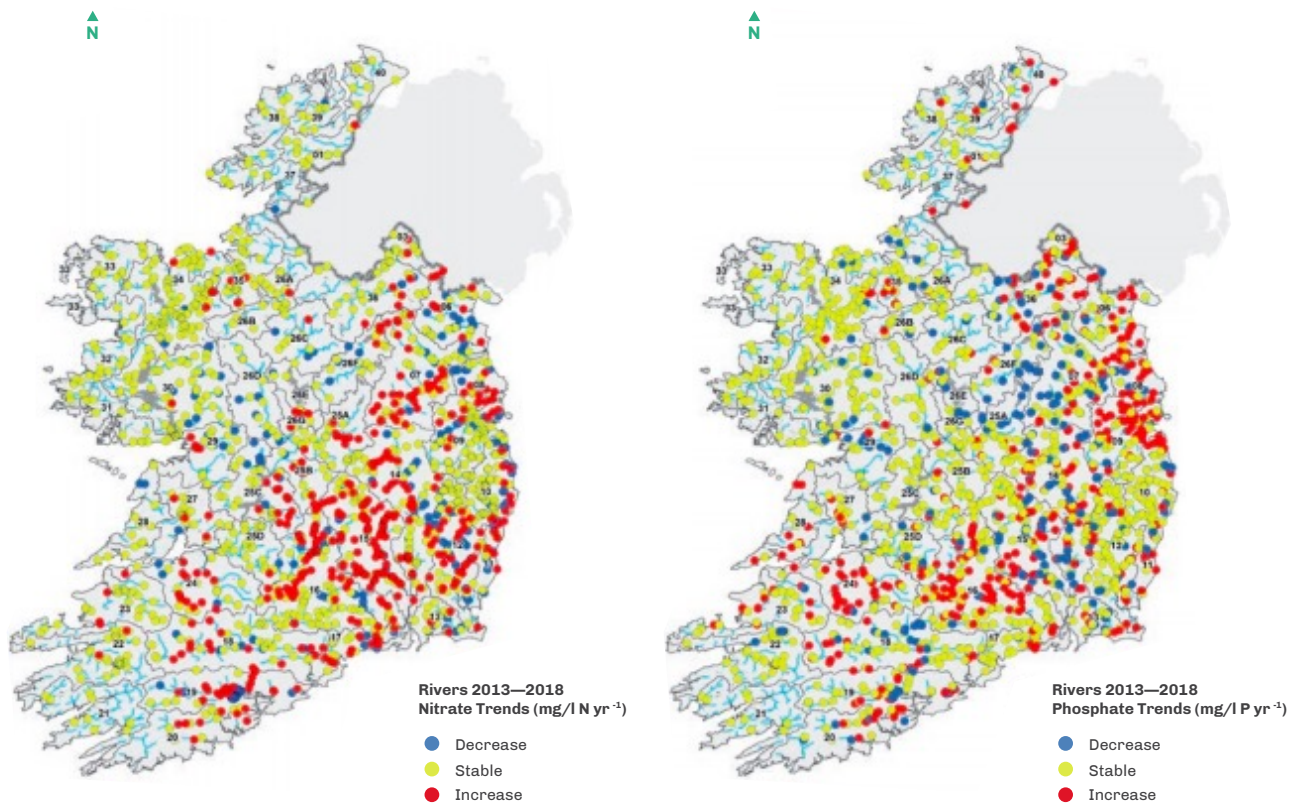


Figure 8 Nitrate (left) and phosphorus (right) concentrations in rivers, 2013–2018, showing trends increasing (red dots), stable (yellow dots) and decreasing (blue dots) (Source: EPA, 2020)

Low-input extensive farming can have local impacts, depending on biophysical conditions. The sensitive nature of some catchment areas means that very low-level on-farm changes can impact negatively on sensitive high-status waters.⁹⁹ The link between agricultural intensification and declining water status has long been proven,¹⁰⁰ and recent intensification has been clearly linked to increased localised water pollution.¹⁰¹ Given that additional measures may be required in sensitive catchments, there is a clear need to differentiate between the potential impacts of different types of farming and their spatial distribution within catchment areas.

The resilience of Ireland's waters (i.e., the rivers' capacity to recover from the impact of further pollution) is greatly reduced by the general degradation of their environmental integrity. This problem will be amplified by climate change, as extreme weather events exacerbate land vulnerabilities and the damage caused by underlying water pollution.^{102, 103}

There has been a recent shift in policy recognising the importance of 'the right measure in the right place', with this principle supported through initiatives such as the Agricultural Sustainability Support and Advisory Programme (ASSAP). However, the Good Agricultural Practices (GAP) regulations, which are the main policy and regulatory tools to control agricultural water pollution, do not reflect this principle. For this and other reasons, including inadequate enforcement, the GAP regulations are widely recognised to be ineffective in controlling nutrient pollution.^{104, 105, 106, 107} They

fail to account for site-specific conditions, and do not provide for targeted farm-specific measures. Furthermore, the ASSAP is a limited scheme targeting a small percentage of farms, and no assessment has been done to ascertain the effectiveness of the scheme in reversing water quality trends.¹⁰⁸

Continued agricultural intensification, in particular intensive dairy expansion, cannot be reconciled with Ireland's commitments to protecting its water environment.¹⁰⁹ On-farm best practice measures to protect water quality are of limited efficacy within a policy framework that facilitates more animals and more nitrogen inputs that have, in turn, been linked to declines in water quality.¹¹⁰ Any such policy is at odds with the WFD.¹¹¹

Effective, substantial and robust mitigation measures to tackle agricultural impacts are urgently required if the necessary water quality improvements are to be achieved,¹¹² and ecological resilience restored. These measures need to immediately address water pollution linked to the intensification of agriculture,¹¹³ and also focus on the localised impacts of intensive and extensive farming systems. The restoration of degraded river systems, as part of broader efforts to restore functioning habitats on agricultural land, should also be incentivised where appropriate. For example, reconnecting rivers to their natural floodplains could form an integral part of a catchment-based integrated land-use plan, that would deliver benefits for biodiversity, water quality and flood attenuation.

We have serious concerns about the prevalence and prospect of continued growth of zero-grazing/feedlot systems on beef and dairy farms. Unlike pig and poultry intensively housed systems, these feedlots do not fall within the licensing requirements of the Industrial Emissions Directive. This is despite the potential environmental consequences. Due to the higher application of inorganic fertiliser and manure used for the production of concentrate feed ingredients, as well as the extra slurry storage requirements, there is the potential for eutrophication of surface waters and nitrate contamination of ground waters in systems where cattle are confined.^{114, 115} Furthermore, ammonia emitted from dairy and beef feedlots is a human health hazard. Studies on existing farms have shown that keeping cows indoors is, unsurprisingly, detrimental to their health and welfare.¹¹⁶

The EPA's Pollution Impact Potential (PIP) maps show the potential critical source areas for agricultural diffuse nutrients in Ireland's water bodies and sub-catchments. These maps will provide a useful management tool for assessing the suitability of certain catchment areas for intensive systems, especially intensive dairy farming. (i.e., 130 livestock manure nitrogen/ha and above).¹¹⁷

We call on the Government to

- Acknowledge the failings of current policy to address agricultural impacts on the water and wetland environment, in light of escalating water pollution and aquatic/wetland habitat degradation. Clearly outline and make publicly available, the relative, catchment-specific impacts of all the main farming types on water status; the incidence & impacts of agricultural wetland drainage; data on agricultural pesticide use & impacts; and impact to date of the application of nitrates derogations on water quality in the catchments of derogation farms. Where this information/analysis is not available, it must be prioritised and the precautionary approach applied in its absence.
- As part of national regulation aimed at aligning the dairy sector with ecological parameters and environmental commitments:
 - Radically overhaul the Nitrates Action Plan so that nitrate derogations are no longer granted unless it can be demonstrated that a given catchment area can absorb the totality of nitrates being applied without negative impacts on water status as per the WFD. Informed by the EPA PIP maps, risk assessments must be carried out on farms applying for derogation, taking into account catchment-scale cumulative impacts.¹¹⁸
 - Require a WFD-specific assessment on all intensive farms (greater than 130 kg livestock manure nitrogen/ha) in areas identified by the EPA as Critical Source Areas (CSAs) for nitrate pollution. If necessary, certain sub-catchment areas may need to be zoned ineligible for certain stocking rates and for the granting of derogation status.¹¹⁹
- Introduce comprehensive measures based on site-specific on-farm assessments in all sub-catchments designated as at-risk¹²⁰ to intercept nutrient transport pathways between critical source areas and watercourses. This is required irrespective of stocking rates, particularly in relation to controlling pollution from phosphorus. Examples include attenuation zones, riparian zones, and appropriately distanced buffer strips.
- Introduce results-based dedicated water-protection schemes as part of wider supports for HNV farming, e.g. wetland protection; flood attenuation; fenced riparian buffers; and low and zero inputs near watercourses.
- Prohibit drainage of all wetlands. Ensure these regulations are enforced, and accompanied by targeted awareness-raising campaigns.

07

Support Sustainable Livelihoods and Incentivise Farm Diversification

Agriculture is at the forefront of the fight against climate change. Simultaneously, farmers are directly exposed to the impacts of extreme weather events, rising input costs and workloads, and related stresses on animal health and welfare.

In comparison to other sectors of the Irish economy, the farming population experiences serious income inequality, with over a third of farms economically vulnerable and at risk of severe poverty.¹²¹ Yet, discussions on reducing agricultural emissions have been broadly perceived by the sector as a threat to farmers' income and livelihoods.

The current livestock and production-focused model also contributes to spatial and sectoral inequalities within the sector.¹²² ¹²³ Average farm income is highest on dairy farms and in the south-east region. The north-west (mainly beef and sheep farmers) is the most disadvantaged region, with the lowest farm income and highest reliance on direct payments and off-farm income.¹²⁴ Agri-environmental schemes, as a source of income, are more important on dry stock farms than on dairy and tillage farms. Improvements in average income have been made since 2018, however these improvements are largely confined to the dairy sector.

Dairy farms account for only 17% of the total farm population; yet, in 2019 these farms represented 48% of the total farm income (€1,074m) generated by the farm population represented.

Farmers face intense pressure from market forces and powerful actors, such as supermarket chains and agribusiness, to produce more and more outputs for a fraction of the price that their produce is sold for. The expansion of the dairy sector has resulted in farmers taking on intergenerational levels of debt to finance this expansion. In 2013, Irish dairy farmers were warned by Teagasc of the risks of price volatility and external cost exposures, and farmers were advised to adapt their farming systems to deal with these risks.¹²⁵

The 2019 National Farm Survey revealed that two-thirds of Irish dairy farmers had an average debt of over €110,000, with levels increasing over the past five years.¹²⁶ This level of on-farm debt, in addition to the risk of low milk prices, rising production costs and the costs associated with extreme weather events, places dairy farmers in a potentially very vulnerable position. Long-term gains to the farm must be weighed against the potential that increased pressure due to farm debt, higher workloads, and extreme weather events have for farmer well-being.¹²⁷

Solutions to the income inequalities experienced by Irish farmers require a shift in our food production model and policies that focus on building sustainable and viable rural communities. This requires linking subsidies to the provision of public goods, building local food supply systems that are based on new forms of cooperation among farmers and consumers, and adding value to farm produce. Just transition principles that seek to address the current inequities within the sector must also underpin this shift to an alternative agricultural model. This will help ensure that farm diversification alternatives and payments for ecosystem services adequately compensate farmers for any radical or abrupt changes that are required.

On Farm Diversification

On-farm diversification (such as agroforestry, horticulture, mixed organic farming, agri- and eco-tourism, and social farming) can improve farmers' livelihoods by opening up new economic opportunities, and reduce the environmental impacts associated with single modes of food production. The absence of economic incentives for on-farm diversification and a route out of damaging agricultural activities has the potential to jeopardise farm incomes even further as Ireland's climate and environmental targets become increasingly onerous.

However, farm diversification should not be narrowly defined by a switch to another single form of land use type or farm activity that compromises local and global environmental quality (e.g., monoculture forestry, or a shift to anaerobic digestion based on grass inputs). It is also important to understand the barriers to diversification. Some farmers can be averse to risk, they can have limited access to agronomic and market information, and a loss of local and traditional knowledge may undermine the capacity of some farmers to consider alternatives. These barriers warrant the need for tailored communication on how to diversify farm systems.¹²⁸

The Government needs to prioritise and reward diverse land use activities that are necessary for a multifunctional agricultural system. This will require broader policy reforms that recognise the multiple services and benefits provided by the land, including the broad range of ecosystem services. Aiming for added-value, shorter supply chains and local markets (such as organic, locally branded or artisan production) as opposed to higher volumes of commodity-based produce would help reduce stocking pressure on farms and allow for mixed farms, increased agroforestry and other biodiversity-friendly measures. Changing consumer preferences to



Image Eoin Campbell

include more locally produced, plant-based products will help open up new market opportunities for farm produce.

Diversification and Ireland's Tillage Sector

Ireland currently imports a high proportion of the cereals, vegetables and fruit consumed nationally. This is despite the fact that a very wide range of vegetable and fruit crops can be grown here, the production of which could be introduced or increased at commercial scale. Ireland's import dependence has been increasing across all main outputs of the tillage sector (i.e., cereals, oilseed rape, pulses, potatoes, and arable fodder crops).¹²⁹ This reflects an increase in demand that has outpaced domestic supplies, and highlights the notable economic opportunities that exist for the Irish tillage sector.

In recent years, calls have been made by representatives in the tillage sector for the economic and environmental contribution of tillage to be recognised as part of a balanced agri-food strategy. Nevertheless, tillage expansion in recent years has been curtailed by a sharp increase in the rental cost of land due to competition from the dairy sector.¹³⁰ Over the past decade, there has been a substantial reduction in tillage acreage especially in areas of the southeast and southwest, where former tillage land is now used by the dairy sector.

Tillage farming in Ireland has a lower emissions footprint than dairy and meat production, and is more calorie, protein and nitrogen efficient than dairy and beef production. However, current systems

are heavily reliant on the routine use of pesticides to minimise the impact of pests and disease, with implications for water quality and biodiversity.¹³¹ Regular tillage is also destructive to soil diversity and function, and can reduce levels of soil organic matter and soil carbon.

The livestock feed sector comprised 93%, 83%, and 65% of the domestic uses of wheat, barley, and oats, respectively, diverting arable land from direct food production. Specifically, 15% of barley (malting/distilling), 32% of oats (milling), and less than 1% of wheat supply were used in human food and drink products. The vast majority of Irish output of pulses is used in the animal feed industry.¹³²

A move towards greater uptake of tillage farming in Ireland would need to focus on substantially increasing the share of output of food ingredients direct for human consumption, and using nature-friendly management techniques to reduce the need for pesticides. Sustaining diverse agricultural land use with 'pockets' of tillage may be of particular value in agri-environmental planning, alongside a shift towards organic tillage production.

We call on the Government to

- Develop, fund and implement a Just Transition action plan for the agricultural sector to identify and address the specific needs of farmers and communities in rural areas. In developing this plan, assess the emissions reductions and environmental benefit of diversification options. Identify the grants, training and advisory supports required, and the potential economic viability and employment opportunities of diversification strategies. Involve those affected by policy changes to identify sustainable alternatives, with support and input from the wider community and civil society working collectively toward rapid and fair solutions.^{133, 134}
- Base diversification strategies on the merits of delivering public goods that deliver landscape and catchment-scale environmental and socio-ecological benefits. These strategies should take into account the local agro- and socio-ecological context, including soil type and the socioeconomic needs of farmers.
- Establish networks of agricultural innovation that provide an enabling environment for on-farm diversification. Facilitate peer-to-peer learning and knowledge transfer between farmers, government agencies, civil society, and research institutes.

- **Expand small scale, local food production. In particular, scale up local and innovative initiatives that shorten, amplify and democratise local food supply chains linking producers to consumers (such as Community Supported Agriculture schemes, farmers markets etc.). Open up marketing and new business opportunities for a range of HNV food produce (such as the development of farm shops, niche products, and ecotourism), and increase the value of HNV produce by linking food with environmental ethics.**
- **Increase the uptake in organic farming in line with the EU Biodiversity Strategy 2030 target of having at least 25% of agricultural land under organic farming management.**
- **As a national policy priority, substitute imported horticulture food items with cereals, fruit and vegetables grown in Ireland. This would improve rural economic resilience and national food security, help promote a healthier diet nationally, and reduce GHG emissions.**
- **Incentivise a shift in the tillage sector away from producing feed grains for the livestock sector, to producing outputs such as cereals and pulses directly for food consumption to reduce Ireland's reliance on imported food. Strengthen supply chains and the domestic market opportunities for Irish tillage farmers by supporting the production of organic certified cereals and pulses that offer price premiums for the tillage sector.**
- **Promote nature-friendly farming methods in the tillage and horticultural sector, including the use of Integrated Pest Management, reduced or no-till farming, crop rotation and cover crops, as well as leaving fallow plots and allowing for arable reversion next to existing natural habitats.**
- **Review the curricula of all agricultural training colleges to ensure that the next generation of farmers has up-to-date skills and knowledge in ecology and climate change.**

“Expand small scale, local food production. In particular, scale up local and innovative initiatives that shorten, amplify and democratise local food supply chains linking producers to consumers...”

08

Contribute to Public Health and Sustainable Consumption

The global growth in animal food demand comes at a significant environmental cost and is inherently resource inefficient.¹³⁵ Plants that could be used for human consumption and directly for nutrition are instead used for the (indirect) process of meat production. The subsequent competition for scarce land between “food and fodder” drives land uses that are incompatible with the Paris Agreement and that undermine global nutrition.¹³⁶ Intensive agriculture can also present direct risks to human health through acute and chronic soil, air, and water pollution as well as by increasing exposure to zoonotic diseases, pathogens, and exacerbating the risk of antimicrobial resistance. Continuing high consumption of livestock products in wealthy countries, including Ireland, and increasing demand for livestock-based foods in large transition economies, severely limits the ability to achieve all of the UN SDGs and the objectives of the Paris Agreement.^{137, 138}

Western diets are characterised by a high intake of meat and dairy products that exceed dietary recommendations.¹³⁹ Tackling poor dietary habits therefore is now a public health emergency that requires a whole-of-government response. Kilocalorie, protein and nutritional recommendations can easily be met with a variety of different diets, including low-carbon diets. Simply adhering to nutritional guidelines, and moving to a healthier diet with less

Image Eoin Campbell



dairy and meat intake will deliver some reductions to greenhouse gas emissions from food production and associated land use. The greatest reductions in emissions can be achieved, however, by eliminating all animal produce from one's diet.^{140, 141}

The contribution of agriculture to food and public health should not only consider the role of livestock in food and nutrition security or in terms of the market value of promoting animal-based produce. The Government must acknowledge the fact that a reduction in meat and dairy consumption is essential to supporting One Health, One Welfare principles, and to reversing global environmental decline.^{142, 143, 144}

Claims that Ireland is efficient at producing food also need to be reassessed.¹⁴⁵ Ireland's efficiency measures rely on out-of-date evidence which may not capture the full life cycle impacts of livestock production and which often do not confront the ethical imperative of reducing absolute emissions from food production regardless of how 'efficient' a particular country may appear to be in comparison to others.¹⁴⁶

Simultaneously, the ethics of high consumption and aggressive marketing, both here and abroad, of high carbon foodstuffs (the production of which has serious environmental impacts) needs a balanced and fair discussion.¹⁴⁷ A sustainable food system must include policies that promote sustainable consumption practices and public health.^{148, 149} Rather than seeing these as a threat to Irish agriculture, marketing and promotional measures should be tailored to accommodate changing consumer preferences and market opportunities.

We call on the Government to

- Ensure that all stages of food production and consumption — from farm to fork and beyond to post-consumption — are in line with an agenda that promotes global health and environmental conservation. This requires a food and agricultural strategy that incentivises a greater dietary intake of organic produce and plant-based foods that are sustainably produced, facilitates a shift away from ultra-processed foods, and supports a drastic reduction in food waste.
- Draw up new Healthy Eating Guidelines and resources that are compatible with the latest science on reducing consumption of meat and dairy-rich produce in line with human and planetary health.
- Implement public health campaigns to promote nutritious, high quality plant-based diets utilising locally and nationally grown food where possible in line with environmental and climate policies, and ensure that any promotion of meat and dairy foods is consistent with up-to-date dietary and environmental considerations.¹⁵⁰

09

Contribute Meaningfully to Food and Nutrition Security

A truly sustainable food system delivers food security and nutrition for all in such a way that the environmental, social and economic bases for food security and nutrition for future generations are not compromised. It must integrate all food-related activities beyond actual agricultural production. This includes food availability, how food is used, how far food travels, whether the food in question requires energy-intensive transportation or not, and access to food, in addition to the consequences for the environment and social equity.¹⁵¹

The One Health, One Welfare principles to agriculture and food production, promoted by the World Organisation for Animal Health, recognise the synergies between human health and animal health for food security, and how these interconnections are interdependent and bound to the health of ecosystems.^{152,153} Implementing these principles however, requires a shift away from intensive, high-throughput livestock production systems. It must involve situating food production within the context of planetary health, fostering resilience and, where possible, shortening supply chains so as to reduce 'food miles', encouraging community involvement in food growing, maximising access to fresh, locally-produced food, and ensuring fairness across the chain of activities that comprise the food system.

Positioning Ireland as an international leader in creating a fairer, healthier and more sustainable global food system requires a transparent assessment of the relationship between food production, land use impacts and environmental deterioration, and how these variables combine to cause food insecurity and societal instability globally. It also means supporting small-scale food producers globally through appropriate accreditation schemes, such as Fairtrade and the Rainforest Alliance, that enhance farmer agency in global food value chains (especially in food items such as coffee, cocoa, etc., where they are dominant suppliers).

As threat multipliers, biodiversity collapse, climate change and resource depletion are the biggest risks to food security and nutrition, with the potential to aggravate existing social, economic and security problems, especially in vulnerable regions of the world.



Image Eoin Campbell

To avoid future breakdowns in food and sustainable livelihoods, it is essential that Ireland ensures its agri-food policy and approach to food systems do not contribute further to climate change.

Policies that purport to contribute to global food security must consider and address land use and transportation impacts, the principle of equal access to food, the right to food production and sustainable livelihoods, and the need to mitigate ecological and climate impacts due to production.^{154, 155}

We call on the Government to

- **Implement clear principles and oversight mechanisms, including mandatory Human Rights and Environmental Due Diligence legislation, to ensure that the commercial links to the global food economy do not undermine Ireland's international development commitments on climate mitigation and sustainable development. Include appropriate assessment tools to evaluate the implications for delivery of the full set of Sustainable Development Goals (SDGs).**
- **Recognise the importance of deforestation-free value chains for agricultural imports. This should involve supporting small-scale farmers globally through appropriate accreditation schemes (Fairtrade, Rainforest Alliance, organic certification, etc.) that enhance their agency in global food value chains (especially in food items such as coffee, cocoa, etc. where they are dominant suppliers). These schemes enable small producers to transition to more sustainable agricultural systems and gain a greater share of the value of their production.**

10

Facilitate Inclusive Dialogue and Participation to Envision an Alternative Model for Agriculture in t

The planetary boundaries and global carbon budget consistent with 1.5°C of global warming are now the context within which all policy choices and strategic decisions must be made. Transitioning to a more sustainable future presents opportunities but will also require difficult political and societal decisions to be made. As a result, it will be necessary to make potential trade-offs explicit, in a way that recognises regional impacts, the strengths and weaknesses of different approaches to food production, and costs and benefits to society as a whole.

We believe that a successful transition to a sustainable food system requires an ongoing dialogue and cooperation between farmers, civil society, and experts across climate, water and biodiversity, and policy-makers an approach that has been lacking to date in the

Image Eoin Campbell



formulation of Irish agri-policy.¹⁵⁷ The policy making process should reflect the diversity of perspectives now needed from a range of stakeholder voices, including farmers from all sectors, agri-extension workers, rural sociologists, political economics, environmental, animal welfare, and public health experts, and consumers to address the complex socio-environmental challenges faced by the sector, and broader public health, food security and sustainable food system challenges. We need a dialogue that is based on creative engagement, including awareness raising and participation in decision-making, via citizens assemblies and/or dialogue fora and regional exchanges, as reflected in the final action of AgClimatise.

The recommendations presented in this report reflect the key positions and priorities of Ireland's largest environmental coalitions. These recommendations provide a strong mandate for an end to a business-as-usual approach to agricultural policy. The Environmental Pillar, Stop Climate Chaos Coalition, and SWAN are committed to engaging in dialogue and discussion with all relevant stakeholder groups, where there is genuine commitment to define and deliver an alternative, more sustainable model for Irish agriculture that is in line with Ireland's climate and environmental obligations.

We call on the Government to

- **Ensure that environmental and climate civil society NGOs are recognised as partner stakeholders by agricultural bodies and the Department of Agriculture, Food and the Marine.**
- **Develop and implement a plan for comprehensive, effective and inclusive public engagement and debate, with adequate time and engagement mechanisms for incorporating public input into the policy making process.**

“The recommendations presented in this report reflect the key positions and priorities of Ireland’s largest environmental coalitions. These recommendations provide a strong mandate for an end to a business-as-usual approach to agricultural policy.”

About the Environmental Pillar, SWAN and Stop Climate Chaos

Stop Climate Chaos is a coalition of over thirty civil society organisations campaigning to ensure Ireland plays its part in preventing runaway climate change. It was launched in 2007 and is the largest network of organisations campaigning for action on climate change in Ireland. Its membership includes development, environmental, youth and faith-based organisations.

It's members are: Afri, BirdWatch Ireland, Christian Aid Ireland, Comhlámh, Community Work Ireland, Concern Worldwide, Cultivate, Cyclist.ie, Dublin Friends of the Earth, Eco Congregation Ireland, ECO UNESCO, Feasta, Fossil Free TCD, Friends of the Earth, Friends of the Irish Environment, Goal, Good Energies Alliance Ireland, Self Help Africa, Jesuit Centre for Faith and Justice, Just Forests, Latin America Solidarity Centre (LASC), Liberia Solidarity Group, Methodist Church of Ireland – Council of Social Responsibility, Mountmellick Environmental Group, National Youth Council of Ireland, Oxfam Ireland, Peoples' Climate Ireland, Presentation Ireland, Tearfund Ireland, Trócaire, An Taisce, Union of Students in Ireland, VITA, VOICE., and Young Friends of the Earth.

www.stopclimatechaos.ie

The Environmental Pillar is made up of thirty-two national environmental non-governmental organisations that work together to represent the views of the Irish environmental sector. The Environmental Pillar creates and promotes policies that advance sustainable development and acts as an advocacy coalition promoting sustainable solutions in areas such as climate change, biodiversity, tree-cover, resource efficiency, transport, planning and water.

It's members are: An Taisce, Bat Conservation Ireland, BirdWatch Ireland, CELT (Centre for Environmental Living and Training), Coastwatch, Coomhola Salmon Trust, ECO-UNESCO, FEASTA, Forest Friends, Friends of the Earth, Global Action Plan Ireland, Gluaiseacht, Good Energies Alliance Ireland, Green Economy Foundation, Green Foundation Ireland, Hedge Laying Association of Ireland, Irish Peatland Conservation Council, Irish Seed Savers Association, Irish Whale & Dolphin Group, Irish Wildlife Trust, Leave No Trace Ireland, Native Woodland Trust, The Organic Centre, The Rediscovery Centre Ireland, Sonairte, Sustainable Ireland Cooperative (Cultivate), Sustainable Projects Ireland (The Village), Vincent Wildlife Trust, VOICE, Wildlife Rehabilitation Ireland, and Zero Waste Alliance Ireland.

www.environmentalpillar.ie

The Sustainable Water Network (SWAN) is an umbrella network of twenty five of Ireland's leading environmental NGOs, national and regional, working together to protect and enhance Ireland's aquatic resources through coordinated participation in the implementation of the Water Framework Directive, the Marine Strategy Framework Directive and other water-related policy in Ireland. SWAN Members: An Taisce, Bat Conservation Ireland, BirdWatch Ireland, Carra/Mask/Corrib Water Protection Group, Cavan Leitrim Environmental Awareness Network, Celebrate Water, Coastwatch, Coastal Concern Alliance, Coomhola Salmon Trust, Cork Environmental Forum, Cork Nature Network, Dodder Action, ECO-UNESCO, Friends of the Earth, Friends of the Irish Environment, Irish Peatland Conservation Council, Irish Seal Sanctuary, Irish Whale and Dolphin Group, Irish Wildlife Trust, Longford Environmental Alliance, Macroom District Environmental Group, River Shannon Protection Alliance, Save the Swilly, Slaney River Trust, Voice of Irish Concern for the Environment.

www.swanireland.ie

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- 64** Article 1 of the Ramsar Convention on Wetlands states that wetlands are areas of marsh, fen, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six metres. Ramsar Handbook 5th Edition. An Introduction to the Ramsar Convention on Wetlands. https://www.ramsar.org/sites/default/files/documents/library/handbook1_5ed_introductiontoconvention_e.pdf
- 65** For example, by reducing grassland and wetland carbon losses, properly managing hedgerows, ending drainage of wetlands, limiting forest harvesting, moving away from intensive agricultural production and drainage on nutrient poor soils, rewetting nutrient rich soils, and managing organic soils for carbon sequestration. Proper protection may require a bespoke law to protect important features. For example, the EIA regulations for hedgerow removal need to be revised; the thresholds must be eliminated and consent for all proposed hedgerow removal should be required.
- 66** Species could include: Aspen, Birch, Oak, Cherry, Holly; valuable high end broadleaves including Maple, Walnut and Spanish Chestnut; native conifer, Scots Pine; and non-native conifers including Cedar, Douglas Fir, European Larch
- 67** Environmental Protection Agency (2020). Ireland's Greenhouse Gas Emissions Projections 2019-2040. Environmental Protection Agency, Ireland. https://www.epa.ie/pubs/reports/air/airemissions/ghgprojections2019-2040/2020-EPA-Greenhouse-Gas-Emissions-Projections_final.pdf
- 68** Eurostat (2020) <https://ec.europa.eu/eurostat/web/products-datasets/product?code=tag00014>
- 69** Launched in late 2020, the Teagasc dairy strategy for 2027 envisages an increase in the dairy herd to 1.65 million dairy cows, which, in conjunction with increases in milk output, will lead to additional methane and nitrous oxide emissions. The N2O emissions are also likely to increase further if the dairy sector remains reliant upon imported feed and additional grazing land, and this dependency could increase further if climate change attributes to more droughts. See: Teagasc (2020). 2027 Sectoral road map: Dairy. <https://www.teagasc.ie/publications/2020/2027-sectoral-road-map-dairy.php>
- 70** The AgClimatise roadmap was developed in the context of the Climate Action Plan 2019, and meeting national targets under the 2030 Effort Sharing Decision and LULUCF decision.
- 71** Bowles, N., Alexander, S., Hadjikakoub, M. (2019). The livestock sector and planetary boundaries: A 54 limits to growth perspective with dietary implications. *Ecological Economics* 160. <https://doi.org/10.1016/j.ecolecon.2019.01.033>
- 72** Agriculture is the single largest sectoral emitter in Ireland. Nitrous oxide and methane emissions have been increasing steadily since the ending of milk quotas in 2015, and are projected to grow over the next decade in line with an increase in animal numbers and fertilizer usage. See: Environmental Protection Agency (2020) Ireland's Environment An Integrated Assessment 2020.
- 73** Rather than waiting until the need to impose top-down strict regulations to meet environmental commitments, with a shift in policy direction now, decision makers can enable a smoother, farmer-led transition to a more sustainable sector. To illustrate the challenges from introducing regulation, it is worth looking at the Netherlands, where farmers held protests dissatisfied with regulation introduced to curb nitrogen emissions. See: Nitrogen crisis from jam-packed livestock operations has 54 paralyzed Dutch economy. Science

- Magazine. doi:10.1126/science.aba4504
- 74 McMullin, B. and Price, P. (2020). Synthesis of Literature and Preliminary Modelling Relevant to Society-wide Scenarios for Effective Climate Change Mitigation in Ireland. Environmental Protection Agency, Ireland. https://www.epa.ie/researchandeducation/research/researchpublications/researchreports/Research_Report_352.pdf
- 75 Centre for Alternative Technology (2018) People, Plate and Planet report https://www.cat.org.uk/app/uploads/dlm_uploads/2018/11/People-Plate-and-Planet.pdf
- 76 The latter is required as part of the two five-year carbon budget periods committed to by the present Government, incorporating an overall 7% per annum national reduction in greenhouse gas emissions up to 2030.
- 77 For a detailed account of the policy drivers of agricultural emissions in Ireland, and possible interventions to reduce emissions, see: Stop Climate Chaos Coalition (2020). Agricultural emissions in Irish climate change mitigation policy: Science and Solutions. http://www.stopclimatechaos.ie/assets/files/pdf/agricultural_emissions_science_and_solutions.pdf
- 78 Beef Industry. Dáil Éireann Debate, Thursday - 11 February 2021. https://www.oireachtas.ie/en/debates/question/2021-02-11/344/#pq_344c; and Dairy Sector. Dáil Éireann Debate, Thursday - 11 February 2021. https://www.oireachtas.ie/en/debates/question/2021-02-11/345/#pq_345
- 79 Environmental Protection Agency (2020) Ireland's Air Pollutant Emissions 1990-2030. The EPA's 2019-updated recalculation of nitrogen inputs (not yet published at the time of writing) is expected to show a large increase in reported ammonia emissions.
- 80 Kelleghan, D., Hayes, E. Everard, M. & Curran. T. (2020). Assessment of the Impact of Ammonia Emissions from Intensive Agriculture Installations on Special Areas of Conservation and Special Protection Areas. Environmental Protection Agency, Ireland. http://www.epa.ie/pubs/reports/research/health/Research_Report_347.pdf
- 81 Ibid.
- 82 Ibid.
- 83 Kelleghan, D., Hayes, E. Everard, M. & Curran. T. (2019). Mapping ammonia risk on sensitive habitats in Ireland. *Science of the Total Environment* 649. DOI: 10.1016/j.scitotenv.2018.08.424
- 84 European Commission (2020). Report from the Commission to the European Parliament and the Council on the progress made on the implementation of Directive (EU) 2016/2284 on the reduction of national emissions of certain atmospheric pollutants. COM(2020) 266 final. https://ec.europa.eu/environment/air/pdf/reduction_napcp/1_EN_ACT_part1_v7.pdf
- 85 European Commission - DG Environment (2020). Review of the National Air Pollution Control Programme Ireland Final Report for European Commission DG Environment Specific contract 070201/2018/791186/SER/ENV.C.3. https://ec.europa.eu/environment/air/pdf/reduction_napcp/NAPCP%20review%20report%20IE%20-%20Final%20updated%2008Jun20.pdf
- 86 Buckley, C. and Krol, D. (2020). An Analysis of the Cost of the Abatement of Ammonia Emissions in Irish Agriculture to 2030. Teagasc, Ireland. <https://www.teagasc.ie/media/website/publications/2020/NH3-Ammonia-MACC.pdf>
- 87 Buckley, C., et al. (2020) An Analysis of the Cost of the Abatement of Ammonia Emissions in Irish Agriculture to 2030. Teagasc, Carlow. <https://www.teagasc.ie/publications/2020/an-analysis-of-the-cost-of-the-abatement-of-ammonia-emissions-in-irish-agriculture-to-2030.php>
- 88 Kelleghan, D., Hayes, E., Everard, M., & Curran, T. (2019).
- 89 Environmental Protection Agency (2020) Ireland's Environment An Integrated Assessment 2020.
- 90 Department of Housing, Planning and Local Government (2018). River Basin Management Plan for Ireland 2018 - 2021. <https://www.gov.ie/en/publication/429a79-river-basin-management-plan-2018-2021/?referrer=http://www.housing.gov.ie/water/water-quality/river-basin-management-plans/river-basin-management-plan-2018-2021>
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- Ireland. Available at: https://www.epa.ie/pubs/reports/water/drinking/DW%20Quality%20in%20Public%20Supplies%202019_web.pdf
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- 103** Environmental Protection Agency (2019) The impacts of climate change on Irish groundwater resources. Wexford, Ireland. Available at: <https://www.catchments.ie/the-impacts-of-climate-change-on-irish-groundwater-resources>
- 104** The GAP regulations do not include interception measures tailored to on-farm physical and hydrological conditions. Whilst the right measure in the right place is appropriate where the pollution pathway is the most critical factor (in the case of phosphorus), it is the source that is the most significant factor in terms of nitrogen.
- 105** Teagasc (2017). Agricultural Catchments Programme Phase 2 Report. Teagasc, Wexford https://www.teagasc.ie/media/website/publications/2018/ACP_Phase_2_Report.pdf
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- 108** The ASSAP scheme is being implemented in 190 56 Priority Areas for Action.
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- 114** Meul, M. Et al. (2012). Higher sustainability performance of intensive grazing versus zero-grazing dairy systems. *Agronomy for Sustainable Development* 32(3), DOI: 10.1007/s13593-011-0074-5
- 115** Hristov, A., et al. (2011). Review: Ammonia emissions from dairy farms and beef feedlots. *Canadian Journal of Animal Science* 91, <https://doi.org/10.4141/CJAS10034>
- 116** Arnott, G., Ferris, C., O Connell, N. (2017). Review: welfare of dairy cows in continuously housed and pasture-based production systems. *Animal* 11, <https://doi.org/10.1017/S1751731116001336>
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- 118** This must also apply to farms over 170kg/Ha that are exempt from derogation through slurry export.
- 119** Environmental Protection Agency (2019). EPA - Nitrates Directive Derogation Consultation Submission Final. <https://www.epa.ie/pubs/epasub/EPA%20-%20Nitrates%20Directive%20Derogation%20Consultation%20Submission%20Final.pdf>
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- 121** Teagasc (2020). Teagasc National Farm Survey 2019 Results. <https://www.teagasc.ie/media/website/publications/2020/>

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- 122** Sage, C. (2017). Connecting agri-export productivism, sustainability and domestic food security via the metabolic rift: The case of the Republic of Ireland," in *Advances in Food Security and Sustainability*, vol.2, Oxford, Elsevier, pp. 41-67.
- 123** Analysis by Birdwatch Ireland revealed clear disparities between northwest, southeast regions across the average total CAP payment received by individual beneficiaries in each county. The scale of this divide is also substantial, with farmers in counties Kilkenny and Waterford (south-east region) receiving almost twice the average CAP payment compared to farmers in Mayo, Sligo and Leitrim (north-west), yet perhaps only half the proportion of farmers in these areas undertake environmental management measures in comparison to the north-west. See: <https://birdwatchireland.ie/app/uploads/2020/08/BirdWatch-Ireland-submission-on-CAP-post-2020-final.pdf>
- 124** The average family farm income in 2019 was €23,934. 44% of farmers earned less than €10,000, 4% of farms earned in excess of €100,000, and there are major differences across Farming Systems. Income figures for 2019 were: Dairy farms: €66,570 (+9% since 2018); Cattle rearing: €9,188 (+11%); Cattle (Other): €13,893 (-6%); Sheep: €14,604 (+9%); Tillage: €34,437 (-15%). See: Teagasc (2020). Teagasc National Farm Survey 2019 Results.
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- 131** Teagasc (2019). National Tillage Conference 2019. <https://www.teagasc.ie/media/website/publications/2019/National-Tillage-Conference-Booklet-2019.pdf>
- 132** Wallace, M. (2020).
- 133** TASC (2020) The People's Transition: Community-led Development for Climate Justice. Available at: https://www.tasc.ie/assets/files/pdf/feps-tasc_the_peoples_transition_-_2020f.pdf
- 134** See the recommendation on a Just Transition for the sector in: Joint Oireachtas Committee on Climate Action (2019). Climate change: A Cross-party Consensus for Action.
- 135** Worldwide, 80% of the area of all agricultural land is used for fodder, with 44% of the world's grain harvest diverted to industrialised meat production. See: Alexandratos, N. and Bruinsma, J. (2012). *World Agriculture Towards 2030/2050. The 2012 Revision*, ESA Working Paper No. 12-03. Rome, Italy: Food and Agriculture Organization of the United Nations.
- 136** Stoll-Kleemann, S. and O'Riordan, T. (2015). The Sustainability Challenges of Our Meat and Dairy Diets. *Environment: Science and Policy for Sustainable Development* 57(3). DOI: 10.1080/00139157.2015.1025644
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- 140** Stoll-Kleemann, S. and O'Riordan, T. (2015); The Lancet Commissions. (2019);
- 141** People, Plate and Planet The impact of dietary choices on health, greenhouse gas emissions and land use. Centre for Alternative Technology. https://www.cat.org.uk/app/uploads/dlm_uploads/2018/11/People-Plate-and-Planet.pdf
- 142** The Lancet Commissions. (2019).
- 143** IPCC, 2019: Summary for Policymakers. In: *Climate Change and Land: an IPCC special report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems*. <https://www.ipcc.ch/srccl/chapter/summary-for-policymakers/>

- 144** The United Nations Food and Agricultural Organisation (FAO) defines sustainable diets as those diets with low environmental impacts which contribute to food and nutrition security and to healthy life for present and future generations. Sustainable diets are protective and respectful of biodiversity and ecosystems, culturally acceptable, accessible, economically fair and affordable; nutritionally adequate, safe and healthy; while optimizing natural and human resources. (FAO. (2010) Sustainable Diets and Biodiversity. FAO, Rome. <http://www.fao.org/3/a-i3004e.pdf>)
- 145** The next agri-food strategy must confront the reality that the vast majority of Ireland's beef and dairy products (€ 7.3bn in 2019) are exported. At the same time, Ireland imported € 10bn in agri-food products in 2020.
- 146** According to the special report on agriculture and land-use in the Climate Change Advisory Council's 2019 Annual Review, Life Cycle Analysis studies indicate that Ireland has the fifth lowest carbon footprint within the EU-27: 19 kg carbon dioxide equivalent per kg of beef compared to an EU average of 22. Using a different methodology, Ireland was found to have the ninth highest carbon footprint within the EU-27 at approximately 28 kg CO₂eq kg beef compared to an average of 22.6. A separate review explored the carbon footprint for global beef production regions (Canada, USA, EU, Australia, Brazil). This study suggests Ireland is closer to the average footprint. The study also highlighted the importance of accounting for land-use change, which may not always be considered in life cycle analysis, where Ireland may have a considerably lower footprint than some non-EU countries. The Origin Green Sustainability Report of 2016 indicates that participating beef enterprises have an average carbon footprint of 11.6 kg carbon dioxide equivalent per kg of beef liveweight. The report notes a large variation in performance, from 5 to 18 kg carbon dioxide equivalent per kg. Similarly, Teagasc has indicated variation according to economic performance of enterprises and type of beef cattle i.e. suckler or dairy breeds. See: Climate Change Advisory Council (2019) Annual Review 2019. P.107. <https://www.climatecouncil.ie/media/climatechangeadvisorycouncil/Climate%20Change%20Advisory%20Council%20Annual%20Review%202019.pdf>
- 147** For examples of these marketing impacts, see: <https://www.irishexaminer.com/news/arid-20461930.html> and <https://www.politico.eu/interactive/the-eu-milk-lookalike-that-is-devastating-west-africas-dairy-sector/>
- 148** Sabaté, J., Harwatt, H., & Soret, S. (2016). Environmental Nutrition: A New Frontier for Public Health. American Journal of Public Health 106(5). <https://doi.org/10.2105/AJPH.2016.303046>
- 149** Reducing both meat and dairy intake more in line with health recommendations would have a positive impact on reducing GHG emissions and freeing up land. Eliminating animal products from the diet altogether is the most effective way of reducing GHG emissions and land use. See: Blake, L. (2014).
- 150** For an example of the explicit promotion of dairy produce in Ireland's education system see The National Dairy Council: <https://www.moocrew.ie/about/national-dairy-council-moo-crew>. A strong case can be made for ending State bodies' promotion of meat and dairy foods in the education system.
- 151** Food and Agricultural Organisation (2017). The future of food and agriculture: Trends and challenges. Rome. <http://www.fao.org/3/a-i6583e.pdf>
- 152** Pinillos, R., Appleby, M., Manteca, X., Scott-Park, F., Smith, C., and Velarde, A. (2016). One Welfare - a platform for improving human and animal welfare. Veterinary Record 179. DOI: 10.1136/vr.i5470
- 153** One Health Initiative (2008). Task Force One Health: A New Professional Imperative. https://www.avma.org/sites/default/files/resources/onehealth_final.pdf
- 154** FAO, IFAD, UNICEF, WFP and WHO (2020). In Brief to The State of Food Security and Nutrition in the World 2020. Transforming food systems for affordable healthy diets. Rome, FAO. <https://doi.org/10.4060/ca9699en>
- 155** Food and Agricultural Organisation (2008). Climate Change and Food Security: A Framework Document. Rome FAO. <http://www.fao.org/tempref/docrep/fao/010/k2595e/k2595e00.pdf>
- 156** Greater representation of the environmental sector was sought on the committee behind the development of Ireland's Agri-food strategy to 2030. This representation included experts in climate science, biodiversity and water quality to ensure that pressing and complex environmental concerns and priorities were reflected in the strategy document. This request was denied.

Notes

The Environmental Pillar

MACRO Centre,
1 Green Street,
Dublin 7, Ireland.

01 878 0116
office@ien.ie
www.environmentalpillar.ie

Stop Climate Chaos

9 Upper Mount Street
Dublin 2
Ireland

01 639 4653
info@stopclimatechaos.ie
www.stopclimatechaos.ie

**Sustainable Water Network
(SWAN)**

9 Upper Mount Street
Dublin 2
Ireland

01 642 5583
info@swanireland.ie
www.swanireland.ie