



Environmental Pillar
working for a sustainable future

Public Consultation on the Mid-Term Review of Food Vision 2030

Department of Agriculture, Food and the Marine

2026

About the Respondent

Please complete the following information:

1. Are you responding as: **An Organisation**
2. Name of individual / organisation: **The Environmental Pillar**
3. If responding on behalf of an organisation, please describe its main activities:

The Environmental Pillar is the advocacy arm of the Irish Environmental Network, where national environmental non-governmental organisations (NGOs) come together to develop and advance policy solutions, and represent the views of the Irish environmental sector.

4. Contact email (optional): karen@ien.ie olivermoorerresearch@gmail.com
5. Would you like your submission to be published? **Yes**
6. Please indicate which sector(s) you are primarily engaged in (tick all that apply):

☐ Farming ☐ Fisheries ☐ Forestry ☐ Food Processing ☐ Retail ☐ Advisory/Research

☒ **Environmental NGO** ☐ Public Sector ☐ Other: _____
7. Do you consent to your submission being processed in accordance with GDPR requirements? **X Yes**
8. Are you responding based on direct experience in the agri-food system? **x Yes**
9. If applicable, please indicate the region in which you are primarily based: _____
10. Any additional background information relevant to your submission:

Mission 1: A Climate Smart, Environmentally Sustainable Agri-Food Sector

Mission 1 seeks to deliver “A Climate Smart, Environmentally Sustainable Agri-Food Sector” and there are seven Goals in this Mission.

- Goal 1** Develop a Climate Neutral Agri-Food System by 2050
- Goal 2** Restore and Enhance Biodiversity
- Goal 3** Protect High Status Sites and Contribute to Achieving Good Water Quality and Healthy Aquatic Ecosystems
- Goal 4** Develop Diverse, Multi-Functional Forests
- Goal 5** Enhance the Environmental Sustainability of the Seafood Sector
- Goal 6** Embed the Agri- Food Sector in the Circular, Regenerative Bioeconomy
- Goal 7** Strengthen Origin Green and other Sustainability Supports to Reflect the Higher Level of Ambition for the Agri-Food Sector

Key Challenges

- Meeting the sectoral emissions targets while maintaining farm viability.
- Improving water quality pressures in certain catchments.
- Ongoing biodiversity decline and habitat fragmentation.
- Afforestation rates.

Key Opportunities

- Expansion of organic farming and eco-schemes.
- Scaling biomethane and renewable energy integration.
- Expansion of native woodland and small forestry plots.
- Hedgerow rejuvenation and planned management cycles.
- Nature-based solutions delivering climate, biodiversity and flood mitigation benefits.

Mission 1 Consultation Questions

- 1. Are the current goals identified under Mission 1 still relevant for the period to 2030?**

☒ Yes ☐ No

- 2. In your opinion, which of these seven goals have made the most progress under Mission 1?**

Goal 6 bioeconomy initiatives

- 3. In your opinion, which of these goals have made the least progress under Mission 1?**

- Goals 1, 2, 3, 4, and 5 have made little real tangible progress. It is difficult to impossible to differentiate achievement levels for goals 1-4 in particular, because each of these is so far off target in reality. Emissions reductions remain far off-track; biodiversity indicators continue to deteriorate; water quality pressures are worsening in many catchments; afforestation targets have repeatedly failed; marine protection targets remain weak. Of these goals 1 and 2 are especially poor with failure now baked into the trajectory of the sector.

- 4. Under Mission 1, what should the absolute priorities be for the period to 2030?**

Absolute priorities should include legally aligned emissions reductions, reductions in reactive nitrogen use, restoration of biodiversity and water quality, peatland restoration, and expansion of nature-based farming systems. Food Vision 2030 should be replaced or revised into a strategy explicitly aligned with ecological limits and carbon budgets.

- 5. Under Mission 1, how can we build greater resilience to future risks (e.g., climate, market and geopolitical shocks), on Irish family farms in the areas of environmental, economic and social sustainability?**

Resilience requires adhering to our binding targets on climate, biodiversity and water; it requires investment in diversification, reduced dependency on imported feed and fertiliser, support for diversification through the reconfiguration of some farm debt, improved land access, stronger local food systems, viable horticulture and tillage sectors, investment in agroecological advisory supports, and engagement in international trade

negotiations with a global wellbeing economy and human rights based focus. Family farm resilience cannot be built through export revenues alone. With the heightened emergency situation regarding fossil fuels and fertilizers due to tariffs and in particular ongoing climate and war-related shocks, urgent action needs to be taken to understand and then secure safe and sustainable domestic food production. This includes commissioning further research into domestic food resilience taking into account the new trade realities and convening wider, more societally representative stakeholder engagement on the island's food resilience.

6. What measures best support achieving the 2030 sectoral emissions ceiling?

Measures should include a declining cap on nitrogen use utilising a catchment based approach, with a view towards ending the Nitrates derogation; voluntary exit schemes for overall herd size management; stronger CAP conditionality, expansion of results-based schemes, reduced fertiliser dependency, peatland restoration prioritising state lands in the first instance, investment in low-input systems; improved supports for tillage and horticulture.

7. How can carbon sequestration from forestry, peatlands and hedgerows be expanded?

Carbon sequestration should prioritise peatland rewetting focusing initially on state land; existing hedgerow requires far stronger protection with stronger, enforced fines and rejuvenation; and workable supports for native woodland expansion, more tailored agroforestry supports, and restoration of existing carbon stocks focusing on state lands initially, rather than offsetting schemes.

8. What supports accelerate water quality improvement?

Water quality improvement requires a catchment based approach, with evidenced based measures to reduce nitrate leachate on free draining soils, particularly in the catchments of concern in the South and Southeast. Nitrogen carrying capacity should be calculated in sensitive catchments, with an allowable nitrogen budget for landowners in those catchments. n, A Water Framework Directive assessment should be carried out for intensive farms to ensure they do not negatively impact on water quality. Compliance

with the GAP regulations has been repeatedly acknowledged as being low, so we require far better enforcement and targeted advisory services to improve compliance. Given the pressure exerted by hydromorphological alteration on Irish waterbodies, we also need stronger focus on wetland protection and restoration.

9. What actions best restore biodiversity on farmland?

Expand results-based agri-environment schemes, protect and restore hedgerows and wetlands, support High Nature Value farming, continue to expand supports for organic farming; and protect at least 10% of farmland under high-diversity landscape features.

10. How can nature-based solutions scale between 2025–2030?

Scale-up requires long-term funding, integration into CAP supports, community participation, catchment planning, and payments for ecosystem services. It means reaching our targets for marine protected areas; prioritising state lands (bord na Mona and Coillte) for restoration - which is 11% of all relevant land; it requires a dedicated fund for nature restoration to the tune of E450 million per year (in 2026 prices) outside of the CAP, spread across farmland, peatland, native woodland, freshwater, coast and the marine, as per the Environmental Pillar's pre budget submission 2026. Similarly, increase funding for the NPWS including its innovative farm plan scheme.

11. Are there any challenges or opportunities not covered under this Mission, which you believe are of significant importance?

This mission in real terms is nowhere near achieving its key targets – agriculture's GHG emissions reductions are within the margin of accounting error when they need to be heading towards 25-30% down by 2030; habitats are in 90% unfavourable condition. Nitrogen use and fertiliser sales are rising while water quality disimproves; forestry targets, in particular native broadleaf targets, are lagging massively. Overall there is very significant policy incoherence between export-led dairy expansion and our environmental commitments and targets. Policies which amount to food dumping, along with our export dependency, also undermine policy coherence with international development goals.

Mission 2: Viable and Resilient Primary Producers, with Enhanced Wellbeing

Mission 2 places primary producers, farmers, fishers and foresters, at the centre of Food Vision 2030 and there are four Goals in this Mission.

- Goal 1** Improve the Competitiveness and Productivity of Primary Producers
- Goal 2** Improve the Creation and Equitable Distribution of Value
- Goal 3** Increase Primary Producer Diversification & Resilience
- Goal 4** Improve the Social Sustainability of Primary Producers

Key Challenges

- Ensuring economic viability, including improving competitiveness, productivity and better equity in the supply chain.
- Generational renewal.
- Providing diversification opportunities.
- Gender imbalance in farm ownership and leadership.
- Farm safety risks and mental health pressures.

Key Opportunities

- Increasing demand for high-quality Irish produce.
- Viable diversification alternatives.
- Implementation of generational renewal recommendations.
- Increased participation and recognition of women in agriculture.
- Collaborative farming models.

Mission 2 Consultation Questions

12. Are the current goals identified under Mission 2 still relevant for the period to 2030?

☒ Yes ☐ No

13. In your opinion, which of these four goals have made the most progress under Mission 2?

None, but there is growth in the organic farming scheme which is overarching across the first 3 goals.

14. In your opinion, which of these goals have made the least progress under Mission 2?

Goals 2 and 3 are especially weak, with the rapid decline in the number of horticulture producers a sign of abject failure of diversification.

15. Under Mission 2, what should the absolute priorities be for the period to 2030? (Limit: 1,000 Characters).

Limit: 1,000 Characters

Current indicators over-emphasise export performance while under-valuing local food systems, horticulture, wellbeing, and resilience. This must change. New priorities should include strengthening local food recognition, resourcing and infrastructure; targeted supports for growing horticulture; improving farmer bargaining power, supporting diversification, increasing resilience to geopolitical shocks, and reducing dependency on volatile global commodity markets. There must be verifiable, third party checked targets for growing domestic production and diversification (currently the only relevant growth targets are for organic farming);

16. Under Mission 2, how can we build greater resilience to future risks (e.g., climate, market and geopolitical shocks), whilst ensuring greater food security?

Food security is inherently interconnected with resilience– the word “whilst” is out of place here. In the first instance, Ireland should convene a wide set of relevant stakeholders to really assess this topic based on the extreme vulnerabilities we face due

to trade and climate/war related shocks. Ireland should commission research similar to that undertaken in the UK as presented in the report "[*Just in Time to Just in Case*](#)" to truly assess the island's ability to feed itself. Ireland does not operate to a defined understanding of food security and is especially exposed to the vagaries of international trade, which are intensifying. However, any understanding of the food security of an island off the north west coast of Europe would require at the very least stronger domestic fruit, vegetable and grain production, local processing infrastructure, seed resilience, regional supply chains including strengthened food hubs and processing; and measurable, strengthening targets to achieve these. There are a number of cogent suggestions for coping with geopolitical shocks emerging in the latest IPES-Food report [*the new geopolitics of food - navigating policies for resilient self-reliance*](#) which should be taken seriously, and complement the above suggested research proposal. Finally, Ireland should take advantage of the coming UN negotiations to replace the SDGs to explore and advocate for a far more balanced and dependable international trade and financial system that is less vulnerable to agricultural price and supply shocks.

17. What actions would best improve long-term income resilience?

True Income resilience requires payments for ecosystem services, local market development, cooperative distribution systems, fairer supply chains, and reduced input dependency. Consideration must be given to a basic income for domestic food producers and organisers; market stabilisation measures via the CMO (Common Market Organisation) of the CAP must be seriously considered

18. How can we encourage generational renewal?

Genuine generational renewal requires land access measures (as developed in France with SAFER, (*Sociétés d'aménagement foncier et d'établissement rural*), a non-profit agency established in 1960 to regulate land markets. Through its monitoring and pre-emption activities it acts as a buffer against land speculation, aids young farmers, and balances sustainable rural development needs), reduced barriers for new entrants, improved supports for women farmers, affordable sustainable well planned housing in rural areas, balanced viable incomes.

19. How can the attractiveness of diversification opportunities be strengthened?

Diversification opportunities require dedicated , vastly widened and improved advisory services including the AKIS which is overly focused on the export economy only; proper support measures for short food supply chain infrastructure, enhanced, streamlined LEADER supports for agri-tourism, local processing, agroforestry and similar; public procurement policy must lead on delivering multifunctional benefits for the public spend ,taking models such as Dulhallow Food Services as the approach to deliver whole-of-society benefits from initiatives such as school meals and meals on wheels. Diversification would be easier to envisage for many farmers - particularly dairy - to consider if farm debt pressures were to be eased through State-mediated negotiations with banks.

20. What supports are needed to enhance gender equality and women's participation?

Supports should include targeted grants, recognition of women's unpaid labour, representation in leadership structures, and succession supports. Current support options under CAP currently being utilised must be improved: Women Farmers Capital Investment Scheme (WFCIS) is a good start; however the requirement of having 5 hectares excludes many horticulturalists . Strengthening women only knowledge transfer groups and the Rural Innovation and Development Fund; encouraging gender focused EIPs.

21. What interventions would improve farm safety, mental health and wellbeing?

Wellbeing interventions should address debt pressures, social isolation, workload, climate anxiety, and uncertainty. Mental health supports should be embedded in advisory systems. Rules for use of machinery, including for the use of hand-held devices while operating machinery should be enforced rigorously.

22. How can economic competitiveness be strengthened while meeting environmental and social sustainability goals?

Competitiveness is not a goal in itself. Rather than focussing on maximising competitiveness within the current highly skewed international trade system, Ireland should advocate for UN-brokered reforms to global trade rules. Domestically it should focus on resilience, lower input dependence, value retention within communities, and

diversified production systems rather than prioritising export expansion. Currently the balance between domestic and export markets is completely skewed and is worsening, due to Bord Bia's reduction in small producer supports (as evidenced by lack of dedicated small producer staff; the ending of Bord Bia vantage and the Taste Council, and the lack of domestic market targets)

23. Are there any challenges or opportunities not covered under this Mission, which you believe are of significant importance?

The most glaring omissions relate to horticulture, local/domestic food systems and small producer supports. Horticulture remains structurally neglected despite Ireland importing the majority of its fruit and vegetables and an alarming decline in numbers producing fresh fruit and vegetables at scale. Local food systems require major policy support.

Mission 3: Food that is Safe, Nutritious and Appealing, Trusted and Valued at Home and Abroad

Mission 3 is titled “Food which is Safe, Nutritious and Appealing, Trusted and Valued at Home and Abroad”, with a particular focus on the importance of trade. There are four Goals in this Mission.

- | | |
|---------------|--|
| Goal 1 | Prioritise Coherent Food and Health Policies to Deliver Improved Health Outcomes |
| Goal 2 | Enhance Consumer Trust in our Food System, Providing Evidence of a Safe, Ethical Food Supply |
| Goal 3 | Create Value Add in Food Through Insight, Innovation and Product Differentiation |
| Goal 4 | Develop Market Opportunities at Home and Abroad |

Key Challenges

- Global competition and trade volatility.
- Increasing health and societal expectations.
- Maintaining consumer trust.
- Increasing innovation and value-addition.

Key Opportunities

- Premium and functional food growth markets.
- Value-added processing and product differentiation.
- Market diversification and strengthening existing markets.
- Leveraging food safety, nutritional and sustainability credentials of Irish food.

Mission 3 Consultation Questions

24. Are the current goals identified under Mission 3 still relevant for the period to 2030?

X Yes

25. In your opinion, which of these four goals have made the most progress under Mission 3?

The mission requires far stronger integration between food, health, sustainability and public procurement policy. The most progress, or more precisely change, is achieving more export growth and premium branding.

26. In your opinion, which of these goals have made the least progress under Mission 3?

Even by the Food Vision 2030 tracker's terms, this is the Mission with the lowest level of achievement: only 1 of 37 actions is considered complete. Coherent health policy, sustainable diets, local/regional domestic procurement, reduction in ultra-processed foods, and domestic market development are severely lacking or have absent targets. For goal 4, there are no domestic market growth targets in either the vision or the implementation plan. For goal 1, there are no named health targets which Ireland will aim for, e.g. with regard to sugar, salt, ultra processed foods and other accepted markers of a healthy diet.

27. Under Mission 3, what should the absolute priorities be for the period to 2030? (Limit: 1,000 Characters).

Limit: 1,000 Characters

Target achievement must not be seen as being "substantially underway" if progress is actually just due to programmes, research, meetings and reports. Substantial progress occurs with fiscal measures, procurement changes, market restrictions or interventions - these are the sorts of measures that must be used. The Government is not implementing its own Green Public Procurement guidance nor taking action to "develop public procurement policies to promote healthy and sustainable diets, particularly in schools and public institutions" as promised in this strategy (Mission 3, Goal 1, Action 5)

Priorities should include targets and taxes to incentivise healthy sustainable diets, public procurement behaviour change including at school meals level, reduction of food poverty

taking into account the fullest range of relevant measures alongside affordability, stronger support for local food producers, and improved access to nutritious food for all. Agri-food policy coherence should integrate the Circular Economy Act, the Food Waste Reduction roadmap, Green Public Procurement Guidance, Healthy Ireland, and the National Obesity strategy.

28. Under Mission 3, how can we build greater resilience to future risks (e.g., climate, market and geopolitical shocks), whilst ensuring greater food security?

Resilience here requires more support for shorter supply chains, diversified domestic production, negotiations on farm and farm contractor debt relief, public food infrastructure, contingency planning for supply disruptions, transition into more resilience civic food system

29. What steps could further strengthen Ireland's global reputation for safe, high-quality food?

Ireland's reputation would be strengthened through measurable environmental improvements, stronger traceability, reduced pollution, coherent climate action, and partnering with other countries to negotiate progress reforms to global trade rules. State-level campaigning on Nitrogen derogation, efforts to change counting mechanisms for climate change, and for the retention of live export trade all damage Ireland's reputation and should stop, as should the de facto dumping of poor-quality dairy and agri-industrial by-products in low-income countries.

30. How can consumer trust be improved to better support increasing health and societal expectations?

Consumer trust improves when food systems are transparent, localised, healthy, environmentally credible and less dominated by ultra-processed food systems and disproportionate retailer and processor power. Investing time, more expertise and structural supports into visibly and verifiably improving civic health would also help with

trust. Consider how the Framework Convention on Tobacco Control could be extended to the ultra-processed foods industry.

31. What supports enable greater value-added processing and innovation?

Multi annual and incrementally improving supports should target small-scale regionalised processing, food hubs, producer cooperatives, structural supports for agroecology, and innovation linked to local and regional food systems. Retention and streamlining the improvement of LEADER supports would be especially helpful in the context of a new CAP putting these and other related Pillar 2 supports under strain.

32. Are there any challenges or opportunities not covered under this Mission, which you believe are of significant importance?

Public procurement can be a whole-of-society, multi-functional public benefit .That it isn't is a major missed opportunity which must be changed immediately. Schools, hospitals and universities should become drivers of local, regional and domestic sustainable food systems.

Mission 4: Innovative, Competitive and Resilient Agri-Food Sector, Driven by Technology and Talent

Mission 4 is titled an “Innovative, Competitive and Resilient Agri-Food Sector, Driven by Technology and Talent”, and there are seven Goals in this Mission.

- | | |
|---------------|---|
| Goal 1 | Move to a Challenge- Focused Innovation System |
| Goal 2 | A Strategic Funding Approach for Research, Development and Innovation |
| Goal 3 | Develop a Dynamic Knowledge Exchange Environment |
| Goal 4 | Enhance the Use of Technology and Data |
| Goal 5 | Maintain and Improve Competitiveness and Resilience |
| Goal 6 | Attract and Nurture Diverse and Inclusive Talent |
| Goal 7 | Policy Coherence in Sustainable Food Systems between Ireland’s Domestic Policy and its Development Cooperation and Foreign Policy |

Key Challenges

- Rising labour, energy and compliance costs.
- Skills shortages and future skills requirements across the agri-food sector.
- Supply chain vulnerability to climate and geopolitical shocks.
- Increasing private sector spend on R&D as a percentage of turnover.
- Technology adoption gaps.

Key Opportunities

- Precision agriculture and automation.
- Expansion of apprenticeships and technician programmes.
- Bioeconomy and renewable energy integration.
- Stronger research-industry collaboration.

Mission 4 Consultation Questions

33. Are the current goals identified under Mission 4 still relevant for the period to 2030?

X Yes

34. In your opinion, which of these seven goals have made the most progress under Mission 4?

Goal 4 has seen the greatest change. "Progress" presumes that this is a good in itself; we argue that it is not. Instead innovation must be understood more broadly than technological efficiency and export competitiveness.

35. In your opinion, which of these goals have made the least progress under Mission 4?

Goals 1 3 and 7 are severely lagging and lacking. There is little policy coherence, local food innovation, social innovation, and challenge-led research focused on resilience and public goods.

36. Under Mission 4, what should the absolute priorities be for the period to 2030? (Limit: 1,000 Characters).

Limit: 1,000 Characters

Priorities should include challenge-led innovation facing the realities of severe supply chain and global trade shocks and prioritising Ireland's ability to feed itself while not drawing excessively on damaging resources which compound problems globally (feeds, fossil fuels fertilizers). Concurrently we should build local food resilience, agroecological advisory systems, public-interest research, and a community-led and local, regional and domestic food infrastructure. Transition supports for agri-food must be fully integrated at all levels, not just in helping improve domestic supply; all levels of agri-food production distribution, processing and consumption should take into account planetary boundaries and our environmental commitments. The fact that no question in this consultation directly integrates goal 7 speaks volumes for how little regard is given to policy coherence with regard to our overseas commitments (Development Cooperation and Foreign Policy)

37. What research areas most require increased investment between 2026–2030?

Research priorities should improve for agroecology, biodiversity restoration, climate adaptation, local supply chains, deep food security, seed systems and public procurement. Reaching the UN target of 0.7% GNI for global assistance; and changing course on global trade dynamics with more targeted support for the poorest nations; this means ending publicly funded initiatives which result in de facto food dumping, in particular via Fat-Filled Milk Powder in West Africa, which can harm the ability of the domestic market development in that region.

38. What supports would accelerate digital transformation and technology adoption?

Digital transformation should not involve extra work or more 3rd party private entities capturing farmer or consumer data; user privacy must be taken seriously, with no loss of power to tech companies; digitisation should prioritise sustainable and fair support for small producers and local food systems, through initiatives that are built using open source technologies and approaches, and which are user/community based rather than focussed on maximising profits for large export-oriented businesses and the interests of venture capitalist investors and multinational tech companies.

39. How can Ireland strengthen skills and talent pipelines across the agri-food system?

Skills pipelines require apprenticeships, agroecology education, local food enterprise supports, and recognition of community food knowledge. This can include following on agroecological farming support into systems that provision for public procurement.

40. What tools or systems are needed to support competitiveness while achieving economic, environmental and social sustainability goals?

Competitiveness is not an end in itself. To bring about greater economic security (which is the goal that competitiveness attempts to achieve) the measures described above should be implemented, alongside multilateral negotiations to reform the current global agricultural trade system and financial architecture, as these encourage short-term hyper-competitiveness at the expense of environmental integrity, resilience, wellbeing, and food security.

41. Are there any challenges or opportunities not covered under this Mission, which you believe are of significant importance?

Food system resilience, seed sovereignty, and short food supply chains remain under-recognised opportunities within Mission 4. Food sovereignty as developed by the global la via Campesina movement has much to offer analytically.

The Four Missions

The core missions of Food Vision 2030 are still relevant to the challenges and opportunities for the agri-food sector:

- Mission 1 “A Climate Smart, Environmentally Sustainable Agri-Food Sector”.
- Mission 2 “Viable and Resilient Primary Producers, with Enhanced Wellbeing”.
- Mission 3 “Food which is Safe, Nutritious and Appealing, Trusted and Valued at Home and Abroad”.
- Mission 4 “Innovative, Competitive and Resilient Agri-Food Sector, Driven by Technology and Talent”.

Nevertheless, are there any comments or proposals on these missions, or the overall vision for Ireland as a world leader in sustainable food systems?

The four missions remain broadly relevant, but Food Vision 2030 has not delivered the scale of systems change required. The strategy remains too strongly influenced by an export-oriented productivist model that conflicts with climate, biodiversity and water obligations.

A revised strategy should:

- Align all targets with carbon budgets, biodiversity restoration and water quality laws;
- Expand support for agroecology, horticulture and local/regional/domestic food systems;
- Invest in resilience, land access and deep locally embedded food security rather than export volume and trade integration alone;
- Acknowledge that some farmer debt and path dependency presents a serious obstacle to urgently-needed diversification and therefore needs to be renegotiated, with government mediation;
- Reform advisory and innovation systems to support environmental and social outcomes;
- Strengthen public land action, public procurement and domestic market development in light of our targets;
- Introduce more democratic and participatory approaches to policy creation;
- Improve accountability, transparency and independent monitoring including via third party assessment of government policy.

Monitoring and Implementation

Have you any comments or proposals regarding the Monitoring and Implementation of Food Vision 2030?

In this regard, you can view [Food Vision 2030 – Annual Reports](#) and the [Food Vision Dashboard](#).

Independent third party monitoring of food vision 2030 is required

General comments or proposals

Have you any general comments or proposals regarding Food Vision 2030 or the approach to agri-food strategy in Ireland?

This strategy is wholly inadequate to deliver on our wider socio-environmental targets, and blind to the very real challenges coming downstream because of this and the immediate threats accentuation due to war and geopolitical trade disruptions. We face a cascade of crises and continue to prioritise export led growth over our own ability to securely and sustainably feed people on this island.

Fundamentally, the strategy does not have nearly enough binding targets or outcomes. The relative importance of achievements is not weighted, and there is no third party validation of progress claims - this is a self-assessment, a self-reported implementation dashboard with no weighting for significance. "Substantial progress" does not actually mean achieving something tangible in this report, such as a reduction in negatives or an increase in positives: the report is really counting action status, not independently verifying that Food Vision's environmental or other outcomes have been achieved.

For example, Mission 1 alone reports 13% achieved, 69% substantial action, 18% progressing, but Mission 1 is supposed to deliver a climate-smart, environmentally sustainable agri-food sector, including emissions reductions, carbon sequestration, biodiversity restoration and water quality improvements. As can clearly be seen from our replies in the relevant sections for Mission1, little to no progress is actually being made.

Here we outline some factors which heighten Ireland's *immediate* exposure to shocks in the agri-food system. These current concerns simply add to compounding concerns over the lack of achievement of policy targets already outlined in this consultation (with regard to climate habitats etc)

While there was [some initial early purchasing of fertilizer](#) in advance of the latest crises, unlike for oil, there are **no strategic reserves for fertilizers** - [or plans to have one](#). We [import 81% of our energy](#) and are [4th most dependent in EU on fossil fuel imports](#). There have been [ongoing fertilizer supply concerns](#) for some years now (since at least Ukraine conflict started)

Fertilizer use is rising again despite some shocks in recent years - up [13% according to latest CSO figures for 2025 compared to 2024](#). The portion that is stabilized urea has grown - [good for reducing air pollution with other benefits too](#) - but [global urea sales are now under threat too](#) facing 24% price rise over next 12 months minimum (ie excluding new shocks), and are already clocking in temporarily at [40% above](#) pre conflict prices. ([You need Urea to make stabilised urea](#)) Prices in Ireland were already among the highest in EU ([Dec 2024](#)).

[All fertilizer and fossil fuel prices are predicted to rise](#) over the next 12 months (and that's without any new shocks). Food prices [will spiral](#) (UK Figures) food price inflation is real [since 2021 and projected out to 2027](#) (note - these Irish figures may not have taken into account latest shocks - [even this just states 10%](#) based on predictions but it's 3 weeks old).

Crises and related emergency money are becoming routinised - some war related (e.g. Ukraine 2022 and fertilizer/tillage shocks) some market (e.g. pig meat price crises 2022), some climate (e.g. fodder crises 2012-2013). A [2024 UCC analysis](#) of the fodder crises stated that they were likely to keep happening due to decreasing grass growth, especially in the south-east; it also identified risks from the combined effects of drought and heat stress. The research pointed to the need for fodder reserves, more managed soil and grazing methods, and early warning systems. The current fuel and fertilizer price shock includes emergency payments to the agri-food sector, with [100m for farming](#). ([alongside excise and carbon tax exemptions](#)) .

Already we subsidise [fossil fuels to the tune of 4.8 billion](#) including for [green diesel](#) for farming. Other crises are compounding - climate change, already impacting [Ireland and the world](#), is becoming more [severe](#) with more weather extremes (longer dry spells, more and more frequent heavy rainfall events, likely increased maximum rainfall annually).

Changing course globally

In addition to domestically-focussed measures, Ireland also needs to improve its standing in the international arena by engaging in future-focussed, values-oriented discussions on global agricultural objectives, rather than simply accepting as given - and then trying to adapt to - the current highly imbalanced and unstable situation.

A number of farmer, research institute and UN-led initiatives are developing guidelines and recommendations to boost global food resilience and achieve better policy coherence on global food trade. A central point of consensus for these partners is the need to move away from the current WTO-focussed trade negotiations and to focus instead on working with the UN institutions and negotiating structures, in order to bring about the needed reforms.

In autumn 2027, the formal UN negotiations to replace the current UN SDGs will begin. Ireland can use its soft diplomatic power to work towards the establishment of coherent and justice-focussed future UN goals which can underpin a transition to regenerative global agriculture.

Potential measures to achieve sustainable and just global food systems are already outlined in the soon-to-be-launched [UN-led 'Roadmap for the Elimination of Poverty Beyond Growth'](#), which includes recommendations on direct supports for agroecology worldwide, along with important broader measures that will strongly affect agriculture, such as:

- the breaking up of monopolies, which would include the large agribusiness consortia
- the replacement of the IMF and World Bank with multilateral currency-clearing institutions that would end the global dominance of the US dollar and enable more balanced trade flows, including in agricultural commodities
- sovereign debt consolidation and (in some cases) cancellation
- global tax harmonisation; this is currently being negotiated through the [UN Framework Convention on International Tax Cooperation](#)

Detailed proposals for a new, UN-brokered world food trade governance framework are being developed by [La Via Campesina](#) and the [Institute for Agriculture & Trade Policy](#).

Clearly, we need to be more resilient, for agri-food and for our own citizens. Our suggestions in the consultation should be taken seriously, so we can begin to address these serious concerns.