1. Introduction

I would like to submit my views and observations in relation to the scope and level of detail to be included in the Common Agricultural Policy Strategic Plan 2023 – 2027 Strategic Environmental Assessment Scoping Report (the "**Report**"). I commend the Report's stated aim of undertaking the assessment by considering the secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects on the environment of the draft CAP Strategic Plan 2023-2027, as well as the interrelationships between the environmental topics[1]. This represents an appreciation for complexity and second-order thinking that is unusual to see in public discourse.

2. Scope of Submission

I have limited the scope of the majority of my views and observations to the *environmental* implications of the Common Agricultural Policy Strategic Plan 2023 – 2027 (the "**Plan**"). I have intentionally refrained from invoking the moral and ethical implications of animal agriculture on nonhuman animal rights, excluding a brief comment on these considerations in my section 5.

3. The Report

My main issue with the Plan is the glaring omission to address the detrimental and significant environmental impacts of animal agriculture. Nor does it doesn't require an excessively expensive report from an external management consultancy firm to decipher these implications. The historical evidence and presently available data is conclusive and damming. Animal agriculture is a significant contributor to environmental degradation, ecological destruction, and the ensuing climate change. My comments in section 5 address this in further detail.

4. Draft Regulations Objectives

One of the objectives of the draft Regulations[2] is to:

> *"improve the response of EU agriculture to societal demands on food and health, including safe, nutritious and sustainable food, as well as animal welfare".*

In the wake of the COVID-19 pandemic, people are becoming more aware of the threat of zoonotics and biorisks. The animal agriculture industry's treatment of nonhuman animals represents one of the great public health risks to humanity in the 21st century from both a food safety and human health perspective. The genesis of this global pandemic was a wet food market, with the original transmission to the first human vector coming via an animal, following human consumption.

> *"We have brought this on ourselves. And it's because of our absolute disrespect for the environment and for animals. Our disrespect of wild animals and our disrespect of farmed animals has all led to these environments where diseases can top over, cross the species barrier, spill over from an animal to a human being…If we just carry on with business as usual, that will actually lead to the end of our species' tenure on planet Earth[3]". – Dr Jane Goddell*

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[1] Section 5.3

[2] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2018%3A392%3AFIN

[3] *Pandemics, wildlife and intensive animal farming,* Jane Goodall, PHD, DBE, Founder – The Jane Goodall Institute and UN Messenger of Peace (2 June 2020)

These zoonotics risks are further evidenced by the fact that Ebola, Bird Flu, Swine Flu, and MERS all have direct links to our treatment and commodification of nonhuman animals.

Additionally, the World Health Organisation has described antibiotic resistance as *"one of the biggest threats to global health, food security, and development"* and that a growing number of infections – such as pneumonia, tuberculosis, gonorrhoea, and salmonellosis – are becoming harder to treat as the antibiotics used to treat them become less effective[4]. This apparently dormant issue is already killing 700,000 people per year. The vast majority of antibiotics produced in the world are consumed by intensively factory farmed animals as a means of accelerating their artificial growth and alleviating the ill-health that comes with keeping them in such dire conditions.

If the European Union wishes to protect the health and safety of its citizens, it must cease incentivising animal agriculture through subsidies that artificially sustain the industry. It must instead incentivise plant-based meat alternatives and decouple from the pervasive political hegemonic influence enjoyed by the large beef and dairy industry in Europe, and especially here in Ireland.

5. Is there additional information that needs to be considered as part of the baseline data?

The draft EU regulations state that *"The EU has signed up to new international commitments – e.g. concerning climate change mitigation (through COP 21) and broad aspects of international development (through the **UN's Sustainable Development Goals – SDGs**), as well as efforts to better respond to other geopolitical developments including migration".*

In light of this reference to the UN's Sustainable Development Goals, I believe it is worth considering The Lancet report[5], published in 2019, which found that:

- more than 820 million people around the world lack sufficient food but yet *"almost two thirds of all soybeans, maize, barley, and about a third of all grains are used as feed for animals";*

- food production of animal products is responsible for up to 30% of total greenhouse gas emissions. The report states that projections for the future show that *"vegan and vegetarian diets were associated with the greatest reductions in greenhouse-gas emissions";*

- agriculture accounts for between 75–84% of freshwater use, making it *"the world's largest water-consuming sector"*. Water is the *"bloodstream of the biosphere"* and supports all biomass growth and determines the extent and distribution of biomes and ecosystems;

- about 60% of world fish stocks are fully fished, more than 30% are over-fished, and catch by global marine fisheries has been declining since 1996;

- manure from animals produces large quantities of methane gas, which warms the earth 56 times faster than carbon dioxide;

[4] https://www.who.int/news-room/fact-sheets/detail/antibiotic-resistance

[5] *Food in the Anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems*, Volume 393, Issue 10170, P447-492 (2 February 2019)

- agriculture is the largest driver of deforestation, desertification (which happens when livestock grazing destroys native vegetation and speeds up soil erosion) and land-use globally;

The Lancet report states that the application of their recommended 'reference' diet — which is a predominantly whole-foods, plant-based diet — can provide a healthy and environmentally sustainable diet for an estimated global population of about 10 billion people by 2050. However, the report states that "*even small increases in consumption of red meat or dairy foods would make this goal difficult or impossible to achieve".*

The Lancet report states that transformation to a predominantly plant-based diet from sustainable food systems is necessary if we wish to achieve the UN Sustainable Development Goals and the Paris Agreement, and to initiate what they term the 'Great Food Transformation' — meaning a substantial change in the structure and function of the global food system so that it operates with different core processes and feedback. They estimate that changes in current food production practices would only reduce agricultural greenhouse-gas emissions in 2050 by about 10%, whereas increased consumption of plant-based diets could reduce emissions by up to 80%.

The majority of the findings in The Lancet Report are mirrored in the EPA State of Ireland's Environment (2020) Recommendation (the "**EPA Report**"). *Chapter 13 Environment and Agriculture* provides the following recommendation in relation to agriculture and environmental issues:

> *"A more holistic farm-and-catchment-level approach encompassing all environmental pressures will be fundamental for making progress towards more environmentally sustainable and low-carbon food production".*

Low-carbon food production means less production of animal products. The EPA Report also acknowledges that *"agriculture is the main pressure on water quality".* These findings are welcome and indicate that a lack of knowledge isn't the issue, but a lack of will on the part of governments and established stakeholders. Market place solutions – through the form of incentives – have proven to be the most effective mechanism for facilitating change, and I think the Plan can act as a gateway towards the implementation of The Lancet and the EPA Reports' recommendations.

6. Do you have further suggestions regarding the scope of the Strategic Environmental Assessment and its proposed assessment of the CAP Strategic Plan?

As idealistic as it may sound, I think Strategic Environmental Assessment should factor in the ethical and moral implications of the CAP Strategic Plan. This would align with objective (i) of the Plan, which aims to *"improve the response of EU agriculture to societal demands on food and health, including safe, nutritious and sustainable food,* ***as well as animal welfare****" (emphasis added)*.

Our treatment and conception of nonhuman animals reflects the moral consciousness of our citizens and, in my view, is linked in a nontrivial manner to how we treat other humans as moral agents. In

the words of Jeremy Bentham, *"The question is not, can they reason? nor, can they talk? but, can they suffer?"*[6].

This would also align with the aim of Article 28(5)(b) of the Regulations which seek to:

> *"**go beyond the minimum requirements** for the use of fertilisers and plant protection products, **animal welfare**, as well as other mandatory requirements established by national and Union law" (emphasis added);*

I believe that Ireland can become a world leader with respect to animal rights and welfare, and that such an achievement would align with the fundamental principles and values upon which our nation was founded. In 1913 James Connolly wrote that *"you cannot build a free nation on the basis of slavery. We are against the domination of nation over nation, class over class, sex over sex"*[7]. To this I would add, *"species over species"*.

The Plan is an opportunity to initiate fundamental change in our treatment of nonhuman animals by funnelling financial resources to plant-based meat alternatives and removing State support for industries that are causing great suffering and harm. Ireland can help to alleviate the suffering of billions of living and still-to-be-born nonhuman animals in light of the fact that, globally, over 210 million land animals are killed every day[8].

7. Conclusion

The draft Regulations acknowledge that *"a modernised Common Agricultural Policy must enhance its European added value by reflecting a higher level of environmental and climate ambition and addressing citizens' expectations for their health, the environment and the climate"*. This requires bold, novel, and pioneering initiatives that represent a change in conventional agricultural practices and culinary norms.

I appreciate the opportunity and civic privilege of being able to provide this submission. I hope the Irish government will consider these observations in preparing Ireland's CAP Strategic Plan for the period 2023 – 2027.

> *"We need to rediscover, with joy and hope, the full meaning of our interdependence as human beings – an interdependence that is international as well as inter-generational, with those who came before us and with those who will come after us; an interdependence that also extends, we increasingly realise, to all the non-human beings with whom we share this fragile planet" – Michael D Higgins, President of Ireland*[9]

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[6] *An Introduction to the Principles of Morals and Legislation (1789)*

[7] Nevin, D. (2005). *James Connolly, A Full Life: A Biography of Ireland's Renowned Trade Unionist and Leader of the 1916 Easter Rising*

[8] *How Many Animals Are Killed for Food Every Day?* Matthew Zampa (16 September 2018). Accessed at https://sentientmedia.org/how-many-animals-are-killed-for-food-every-day/

[9] Higgins, Michael D: *Recovering Possibilities,* The Royal Irish Academy Dublin (13 November 2015)