Submission on behalf of Go Vegan World to the Public Consultation on Climate Action Plan 2024

Go Vegan World is an international animal rights and advocacy organisation based in Ireland. Go Vegan World is founded on the notion that everyone has the fundamental right not to be owned, bred, used, harmed or killed, regardless of species. Living vegan respects these fundamental rights. Go Vegan World exists to educate the public on animal rights, to promote veganism, to dispel the myths that sustain animal exploitation, and to dismantle the legal property status of other animals.

Impressions of the Climate Action Plan 2024:

The 2024 Plan was published on the weekend before Christmas 2023, with public consultation opening in February 2024. This public consultation closes in early April and some time will then be taken to consider the submissions received before changes are implemented in the Plan. How late in the year will the Plan for 2024 be enacted? It would seem careless to begin a year without a Plan for that year and that the Plan may not be finalised until the middle of the year gives too little time within which to enact the measures.

Last year, the Climate Action Plan 2023 was assessed by the EPA and they found that, if fully implemented, it could deliver up to 29% emissions reduction by 2030[1] compared to 2018. This is barely more than half the stated Government's **minimum** target of at least 51% by the end of the decade. Suggesting that unallocated emissions savings would close the gap somewhat, as the 2024 Plan document notes (page 20) does not add credibility. There is no indication that any critical real assessment of the measures in the 2023 Plan was carried out, or that the measures included in the 2024 Plan will go anyway towards bridging the deficit to this minimum target.

In this submission, Go Vegan World is highlighting a pair of material measures that have been ignored completely in the 2024 Plan, as they were for the 2023 Plan, but can be disregarded no longer - a wholesale move to plant-based diets and a plant-based agricultural system.

Preamble:

Rather than this being a submission about how the Climate Action Plan 2024 addresses/communicates dietary change as a much needed measure to address GHG emissions, we are compelled to make this submission in order to get dietary change and agricultural system change included in the Plan itself. The absence of these material measures from the Plan harms the Plan's credibility. The omission of such steps from an 'action' plan points towards either environmental ignorance of the impact of animal agriculture or the perception of lobbyist pushback against such an action being included.

[1] https://www.epa.ie/news-releases/news-releases-2023/ireland-projected-to-fall-well-short-of-climate-targets-says-epa.php

The aim of Go Vegan World has always been to expose the inconsistency between our values and our behaviour. We claim to respect facts; yet we live according to myths. We claim, as humans, to be humane, courageous and open minded, yet we refuse to look at the consequences for others of how we live our lives. In many ways, our reaction to climate action is an example of this cognitive dissonance in action - we want to believe we live in a sustainable manner but to do so without wanting to compromise our way of living. It is the mismatch between these two conflicting positions that has left Ireland as a consistently poor performer on climate action when it comes to international comparisons[2]. We like to think we're acting with the required level of ambition but it is clear that we are not. In that context, the latest iteration of the Climate Action Plan is a missed opportunity to show the leadership needed to address our emissions.

Context:

According to the UN Food and Agriculture Organisation, food systems account for more than one third[3] of global greenhouse gas emissions. This includes the production, processing, transportation and storage of food. In Ireland, the share of emissions attributable to agriculture alone is almost 40% and this has been increasing steadily since the turn of the century (according to the EPA, agricultural emissions were 30% of total emissions in the year 2000). The Climate Action Plan errs on page 287 when it claims 74% of agricultural emissions comes from farmed animals. This figure only accounts for enteric fermentation and manure emissions. The true figure is much greater, since the emissions from chemical fertiliser used to grow crops to feed farmed animals is not included. When it comes to mitigation of agricultural GHGs, the 2024 Plan regurgitates the same technology fixes that have been doing the rounds for over a decade, while the State's policy was leading to year-on-year increases in emissions. Once again, the cognitive disconnect between claimed ambition and the reality of inaction is laid bare.

The environmental science surrounding dietary shift is clear and unequivocal. The need for change is recognised throughout the literature on the subject. Research has shown that even if fossil fuel emissions stopped immediately, emissions from the global food system alone could raise global temperatures by more than 1.5°C[4] (the target under the Paris agreement). This finding was published in 2020 and we know that global emissions did not even peak at that point[5]. As the measure that would have the most material impact on agricultural emissions, the case for dietary change is even more compelling now. The need to communicate the urgency for change is critical for any Climate Action Plan. If the Plan had even moderate ambition and spoke of reducing the consumption of animal-derived foods, this would somewhat reduce food related emissions. But that is no longer sufficient. Last year the Secretary General of the UN António Guterres said[6] that 'our world needs climate action on all fronts - everything, everywhere, all at once'. In other words, we must utilise every climate measure available to us, to the maximum extent, to avoid the worst excesses of climate

[2] https://ccpi.org/

[3] https://www.fao.org/newsroom/detail/Food-systems-account-for-more-than-one-third-of-global-greenhouse-gas-emissions/en

[4] https://www.oxfordmartin.ox.ac.uk/news/change-what-we-eat-to-solve-the-climate-crisis/

[5] https://www.france24.com/en/environment/20221027-iea-expects-global-emissions-to-peak-in-2025

[6] https://www.un.org/sg/en/content/sg/statement/2023-03-20/secretary-generals-video-message-for-press-conference-launch-the-synthesis-report-of-the-intergovernmental-panel-climate-change

breakdown. This clear message should be echoed throughout every Climate Action Plan measure.

The Plan must reflect an ambition to meet our legal and moral commitments under the Paris Agreement. As the UN Intergovernmental Panel on Climate Change (IPCC) has repeatedly said[7], every bit of warming matters. Every year matters and every choice matters.

We also have a legal right to a clean, healthy and sustainable environment.[8] Yet, human activity is putting our enjoyment of this right, and the enjoyment of future generations at risk. In particular, environmental degradation, the climate crisis and unsustainable development, threaten our right to life. Animal agriculture is a key driver of these threats.

Moving to a plant-based diet/agricultural system has the potential greatest impact of any in a Climate Action Plan. Citizens need to understand what climate actions deliver a material change in GHG emissions.

A recent survey of Irish attitudes and behaviours to climate change showed that while 85% of people are worried about climate change, only 61% know that climate change is mostly caused by human activities, and only 33% know that Ireland's agriculture sector is the largest source of the pollution that causes climate change.[9] [10] It is very obvious that the role of animal agriculture in the climate crisis and unsustainable human activity is downplayed. That this Plan doesn't even mention these key actions points to a chasm in its preparation.

There are two strands to this gap in the Plan:

- Advocating for plant-based (vegan) diets
- Supporting the transition to a plant-based or other non-animal agricultural system.

One measure reflects the need for a change in demand for animal flesh, fish, eggs, dairy and other animal products, the other a system change in agriculture and land use. Consumers have agency and a responsibility to leverage for change. Communication with the public is needed (and needs to start now) to allow the change to be understood.

Promoting and adopting plant-based diets at home would have a material GHG impact. This requires wide scale adoption. The State needs to communicate this to the public and proactively seek change to this end. This should be a central tenet of every Climate Action Plan.

Given we import most of what we eat and export most of the animal flesh and dairy from these shores, there is also a clear need to change our farming system. There are appreciable benefits beyond GHG emissions of this measure. We know the impact that the status quo has on emissions but there are ecological, resource and pollution matters that also need to be addressed. On May 9th, 2019, Dáil Éireann declared a climate and a biodiversity emergency.

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[7] https://www.ipcc.ch/sr15/about/foreword/

[8] The human right to a clean, healthy and sustainable environment : resolution / adopted by the Human Rights Council on 8 October 2021, UN. Human Rights Council (48th sess. : 2021 : Geneva).

[9] Climate Change in the Irish Mind, 2021: Wave 1, Report 1, https://www.epa.ie/publications/monitoring--assessment/climate-change/climate-change-in-the-irish-mind.php.

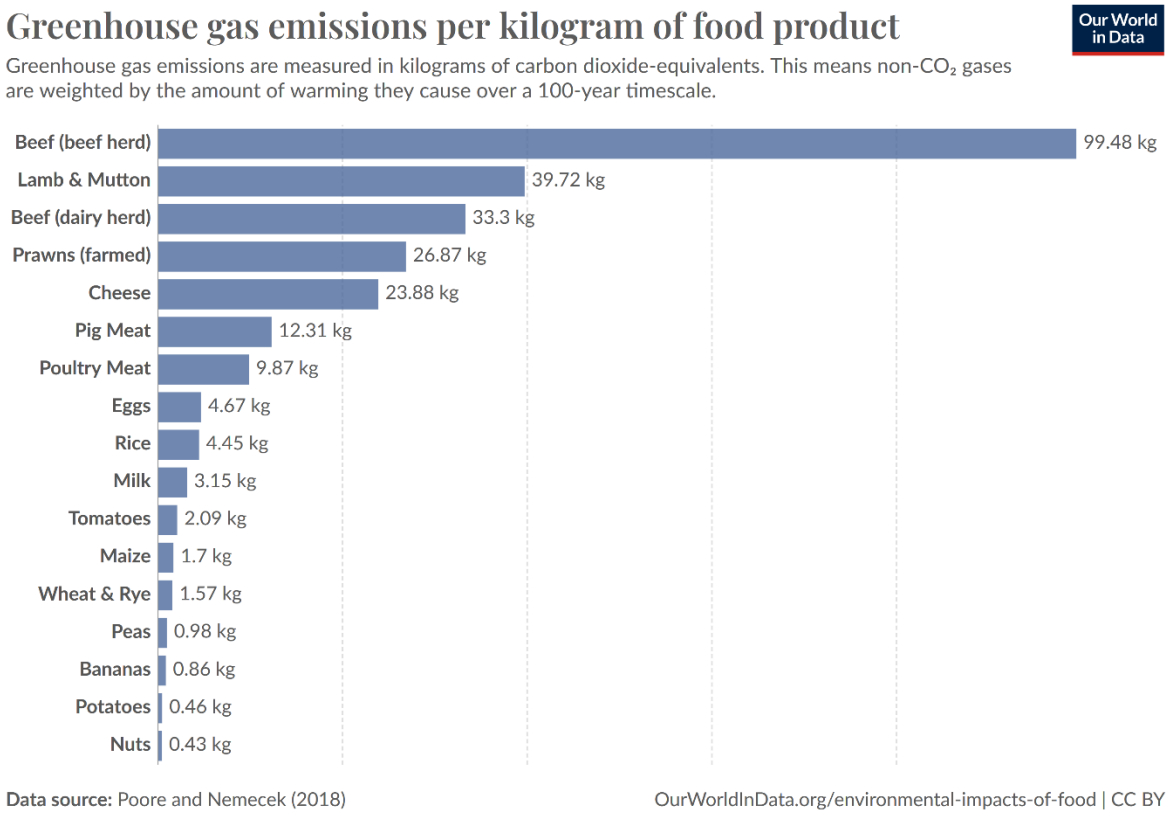
[10] Climate Change's Four Irelands, (2022), https://www.epa.ie/publications/monitoring--assessment/climate-change/climate-changes-four-irelands.php.

It is clear that this Climate Action Plan does not do enough to address these dual emergencies. As animal agriculture uses more land (>59%) in Ireland than every other land type combined[11], it is not credible that we could address our biodiversity losses without addressing animal agriculture. This is to say nothing of the four to five million tonnes of feed imported every year to sustain animal agriculture[12].

Adopting a plant-based agricultural system, which seeks to grow food to feed people directly needs to be a target of every national climate plan.

In 2018 a study[13] showed that animal agriculture uses 83% of farmland globally and produces 60% of agriculture's GHG emissions. Yet it only provides 18% of calories and 37% of protein.

The following graph from the study illustrates disparity in the GHG emissions per kilogram of animal products versus plant foods.



Animal agriculture is a grossly inefficient method of food production to say nothing of the gross injustice it perpetrates on the animals used in agriculture, the harm to free living animals, the intersectional issues of risk to the wellbeing and life of agricultural workers, human health risks including zoonotic disease and pandemics, and the risk to human health and life of environmental degradation and climate heating.

[11] https://www.cso.ie/en/releasesandpublications/ep/p-eii/environmentalindicatorsireland2022/landuse/
[12] https://www.oireachtas.ie/en/debates/question/2022-05-04/562/
[13] Poore, J., & Nemecek, T. (2018). Reducing food's environmental impacts through producers and consumers. Science, 360(6392), 987–992.

Joseph Poore at the University of Oxford, UK, lead author of the 2018 study, is quoted as saying:

> "A vegan diet is probably the single biggest way to reduce your impact on planet Earth, not just greenhouse gases, but global acidification, eutrophication, land use and water use. It is far bigger than cutting down on your flights or buying an electric car as these only cut greenhouse gas emissions."

Despite industry attempts to denigrate[14] vegan replacements for animal dairy, flesh, fish and egg products, a recent paper[15] shows that as well as being far more sustainable compared to animal products in terms of greenhouse gas emissions, water use and land use, plant-based animal product alternatives also have a wide range of health benefits. Author Christopher Bryant is quoted as saying "Increasingly we're seeing how plant-based products are able to shift demand away from animal products by appealing to three essential elements consumers want: taste, price and convenience."

We know from research released in the past month that the EU subsidises animal agriculture at four times the rate of growing food[16], despite the relative environmental and ecological impacts of these two activities. The research has found that the subsidies, by design or accident, incentivise farmers to occupy more land, resulting in adverse outcomes for the dietary transition that's needed. To produce the same amount of protein, beef requires 20 times more land than nuts and 35 times more land than grain.

The research is quite clear on the potential for plant based consumption to reduce emissions. A recent study[17] compared the environmental impact of the diets of vegans, vegetarians, fish-eaters and flesh-eaters. The study involved analysis of the real diets of 55,000 people in the UK. It also used data from 38,000 farms in 119 countries to account for differences in the impact of particular foods that are produced in different ways and places. This significantly strengthens confidence in the conclusions showing that what was eaten (plant versus animal product) was far more important in terms of environmental impacts than where and how it was produced. The paper was acknowledged as representing the most comprehensive attempt to link food consumption data to the data on the environmental impacts of dietary choice and food production. A plant-based diet created 75% less climate-heating emissions, water pollution and land use than diets in which more than 100g of meat a day was eaten. This study found that plant-based diets also cut the negative impact on wildlife by 66% and water use by 54%. Perhaps the most significant finding was that vegan diets cut methane emissions by 93.5%.

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[14] The Backlash to Plant-Based Meat Has a Sneaky Explanation, https://www.truthdig.com/articles/the-backlash-to-plant-based-meat-has-a-sneaky-explanation/

[15] Christopher J. Bryant, Plant-based animal product alternatives are healthier and more environmentally sustainable than animal products, Future Foods, Volume 6, 2022, 100174, ISSN 2666-8335, https://doi.org/10.1016/j.fufo.2022.100174.

[16] https://www.theguardian.com/environment/2024/apr/01/eu-four-times-more-money-farming-animals-than-growing-plants-cap-subsidy

[17] Scarborough, P., Clark, M., Cobiac, L. *et al.* Vegans, vegetarians, fish-eaters and meat-eaters in the UK show discrepant environmental impacts. *Nat Food* (2023). https://doi.org/10.1038/s43016-023-00795-w

Cutting methane emissions now could help prevent catastrophic short-term outcomes, as we wait for more long-term investments in CO_2 emissions reductions to pay off.[18] [19]

This finding alone illustrates the enormous potential of the transition to plant-based consumption to avoid the worst effects of the climate crisis and it is something every individual can do by making the choice to consume plant products instead of animal products in their diet.

A report on land use published by the IPCC in 2019 showed that efforts to curb greenhouse-gas emissions and the impacts of global warming will fall significantly short without drastic changes in global land use, agriculture and human diets. The IPCC has recognised the scaled impact that plant-based diets can have[20] and every Climate Action Plan for Ireland needs to make that same connection.

Dietary change is also the most meaningful step to address biodiversity loss, reducing strain on land and water resources, less pollution, and fewer nitrogen- and carbon-based GHG emissions. The 2024 plan recognises these benefits (page 284) but not the key drivers that can make this happen. This is all the more reason why the Climate Action Plan must be clear and unambiguous on the measures that matter. Communication with the general population must consider the climate actions that matter most and that can scale into a meaningful environmental impact (with welcome ecological and health benefits also).

The iniquitous impact of those with power, typically manifested in industry lobbying, needs to be noted and understood[21] [22]. The Seeing Stars report outlines how a new metric for measuring methane being championed by the animal agriculture industry could allow the industry to minimise emissions and avoid climate action. The briefing shows that using GWP* to measure the heating impact of short lived greenhouse gases instead of the current metric, GWP100, could radically alter how animal agriculture emissions are assessed.

> "Internal documents released under a Freedom of Information request reveal the Department of Agriculture, Food and the Marine is keen to adopt GWP* amid concerns that it will need to reduce herd numbers to meet its climate commitments

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[18] Methane: A crucial opportunity in the climate fight, Environmental Defense Fund https://www.edf.org/climate/methane-crucial-opportunity-climate-fight (Accessed 01.01.2023)
[19] Methane Emissions are driving Climate Change. Here's How to Reduce Them, UNEP, Climate Action, 2021. https://www.unep.org/news-and-stories/story/methane-emissions-are-driving-climate-change-heres-how-reduce-them (Accessed 28th December 2023).
[20] IPCC, 2019: 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 [P.R. Shukla, J. Skea, E. Calvo Buendia, V. Masson-Delmotte, H.-O. Pörtner, D. C. Roberts, P. Zhai, R. Slade, S. Connors, R. van Diemen, M. Ferrat, E. Haughey, S. Luz, S. Neogi, M. Pathak, J. Petzold, J. Portugal Pereira, P. Vyas, E. Huntley, K. Kissick, M. Belkacemi, J. Malley, (eds.)].
[21] Carter, Nicholas (2024, February). Harvesting Denial, Distractions, & Deception: Understanding Animal Agriculture's Disinformation Strategies and Exploring Solutions.
[22] Carter, N and Urbancic, N (2023) Seeing Stars: the new metric that could allow the meat and dairy industry to avoid climate action. Changing Markets Foundation. https://changingmarkets.org/report/seeing-stars-the-new-metric-that-could-allow-the-meat-and-dairy-industry-to-avoid-climate-action/

and that it has been advocating for GWP* at the international level including during discussions on the adoption of the Global Methane Pledge."[23]

Last year, a draft report in which the IPCC recommended a shift to plant-based diets was changed just before publication under intense pressure from the meat industry[24] to skirt around the definition of a sustainable diet. References to animal-derived foods as being 'high carbon' are routinely deleted (since such UN reports require unanimity from member states) in order to slow or stop climate action[25]. In this regard, the animal agriculture industry has been working in line with the fossil fuel industry to protect their own interests at the expense of the environment. Perhaps this perceived lobbying power is what has repeatedly stopped system change in agriculture in Ireland being proposed in the Climate Action Plans?

The 2024 Plan makes only passing references to the UN's Sustainable Development Goals ('SDGs'), and says that 'Ireland is committed to supporting accelerated action towards fulfilling the SDGs, the Rio Conventions and the goals of the Paris Agreement' (page 387). This language is much too weak. Our obligations under these agreements/goals should be definitively restated, as should our commitment to achieving them. There are a number of the UN's SDGs that could be positively impacted by a change to living within climate limits, and this intersectionality should be given some consideration in the Plan.

For example, a shift in dietary patterns and agricultural outputs (led by Ireland domestically, and for our export markets) would, on the face of it, help toward achievement of SDG 2 (Zero hunger), SDG 3 (Good health and wellbeing), SDG 6 (Clean water and sanitation), SDG 12 (Responsible consumption and production), SDG13 (Climate action), SDG14 (Life below water), and SDG15 (Life on land). We have much to gain through appropriate climate action but consideration needs also to be made for the nations of other species, some of which will only avoid extinction if we act in a manner that recognises their intrinsic rights.

Conclusion:

Given the scientific, health, ecological, ethical and environmental benefits of transitioning to plant-based consumption and production, the credibility of the Plan itself is called into question given that there are **no** references to dietary change and the related agricultural system change, across its 420 pages. The same glaring omission occurred in the 2023 Plan (across 280+ pages) and this pattern of repeated omission cannot be ignored. This is surely an error that must be corrected before the Climate Action Plan 2024 is finalised.

The need for a just transition in a climate plan is essential. Veganism holds justice as a central principle and this submission is made with that in mind. The need for dietary change must be communicated more clearly to allow that transition to begin and the Climate Action Plan should provide that message. The need for change has never been more pressing and it is incumbent on those in positions of power and influence, that are to act in the public interest, to

[23] https://changingmarkets.org/press-releases/meat-and-dairy-industry-pushing-for-a-metric-that-minimises-their-methane-emissions/
[24] https://finance.yahoo.com/news/meat-industry-blocked-ipcc-attempt-181600195.html
[25] https://unearthed.greenpeace.org/2021/10/21/leaked-climate-lobbying-ipcc-glasgow/

communicate the scale of change needed. Ignoring steps that would produce material ecological and environmental results at scale is simply indefensible.