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A Retrospective Public Health Analysis of the Republic of Ireland's Food Harvest 2020: Absence, Avoidance and Business as Usual.

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Critical Public Health, 2017

The concept of an Ecological Approach to health and including Health in All Policies (HiAP) warrants inter-sectoral and transdisciplinary collaboration to improve health determinants and reduce health inequities. Agriculture policies, which greatly influence food production and its environmental impacts as well as food availability and dietary consumption, are therefore of interest to public health. Increasing rates of non-communicable diseases (NCDs) linked to diets containing high levels of processed foods, increasing numbers of households unable to access nutritious food, and the environmental consequences of the food system are amongst the major health challenges of today, both globally and in Ireland. In 2010, Ireland's Department of Agriculture, Food and Fisheries (DAFF), published Food Harvest 2020 a roadmap for Irish agriculture for the subsequent decade prepared against a backdrop of rising diet-related ill-health and increasing environmental concerns. This article critically analyses the process of consultation and stakeholder involvement in the development of Food Harvest 2020 from a public health perspective. Publically available documents including submissions to the Food Harvest 2020 consultation process were the primary source of data. This study highlights a distinct absence of public health representation in the process, an avoidance of some key public health challenges, and the dominance of a 'business as usual' approach.

Keywords: Public health policy, agricultural policy, policy process, food industry, diet-related health

Introduction

An ecological approach to public health policy (Rayner & Lang, 2012) is based on the principle that health is dependent on the synchronisation of the natural environment and people. This approach recognises “humans as part of the ecosystem, not separate from it, though not central to it” (Bentley, 2014, p.528). Consequently, it designates co-responsibility for public health denoting that no one agency, institution or person can resolve public health problems on their own given the complexity and interconnectedness of human health and eco-systems health. This approach warrants ‘upstream thinking’ as opposed to ‘downstream responses’, transdisciplinary as opposed to multidisciplinary, and sustainable solutions to the detriment of quick fixes (Rayner & Lang, 2012). Using an ecological public health perspective, this paper presents a critical public health analysis of the processes of consultation and stakeholder involvement in the development of the Republic of Ireland’s Food Harvest 2020 (hereafter FH2020). FH2020 was published in July 2010 as a roadmap for the future of Ireland’s agricultural sector over the next decade. Since 2010, the number of dairy cows in Ireland has increased by 28.58 percent (Central Statistics Office (CSO), 2016a) and milk production by 23.61 percent (CSO, 2016b). In 2009, prior to any increases, Ireland’s total greenhouse gas (GHG) emissions were the second highest per capita in Europe (CSO, 2012, p. 5). Despite warnings that “environmental constraints may be the new milk quotas” (Hennessy & Kinsella, 2012, p. 71) and that GHG emissions will grow on an annual basis reflecting the “impacts of Food Harvest 2020” (Environmental Protection Agency (EPA), 2013, p. 4) the productivist imperative was regarded as central to economic recovery following the 2008 financial crisis (O’Shaughnessy and Sage 2017).

Background

Since 1992 governments worldwide have been encouraged to develop national plans for nutrition and food policies informed by an ecological perspective including a food systems approach and inter-sectoral integration (Carey, Caraher, Lawrence, & Friel 2015). Such an approach supports the concept of Health in all Policies (HiAP) (World Health Organisation (WHO), 2013) given that determinants of health predominately remain outside the traditional public health domain (Marmot, *et al.*, 2008). Consequently, the HiAP approach is defined as a “horizontal complementary policy-related strategy with a high potential for contributing to population

health” (Mannheimer, Lehto, & Ostlin, 2007). Including health concerns in all policies as a key responsibility for all governments is not a novel concept and was first introduced by the Ottawa Charter for Health Promotion (WHO, 1986). Yet, despite the public health impacts of agricultural policies, public health officials are rarely present at the discussion table (Shaffer, Waitzkin, Brenner, & Jasso-Aguilar, 2005). Indeed, the principal concern is often a healthy economy above a healthy population (Bødker, Pisinger, Toft, & Jørgensen, 2015), with food regarded purely as a commodity (Friel *et al.*, 2016) leaving limited public health engagement in the policy process (Caraher & Cowburn, 2015). The political determinants of health, specifically the politics of food, ought to be a key area for public health intervention (Lang, 1997; Coveney, 2003; Nestle, 2014) if the current dissonance between ecological public health goals and economic goals are to be addressed.

The agri-food industry is perceived as one of Ireland’s most important indigenous sectors (Department of Agriculture Food & the Marine (DAFM), 2014) particularly in light of the economic crisis that hit Ireland in 2008. These impacts were particularly felt in the non-dairy farming community which at the time had an income roughly 50 percent below the average industrial wage and were heavily reliant on off-farm employment (Hennessy & Kinsella, 2012). Thus, 2009 was seen as “an opportune time to develop a roadmap” for the future of the agri-food industry (Department of Agriculture, Food & Fisheries, (DAFF) 2010a). In July 2010, Ireland’s DAFM (formerly known as DAFF), released FH2020 - a self-proclaimed “industry-led”, “export-driven” ten-year strategic plan for the development of the Irish agri-food sector (DAFF, 2010). FH2020 set ambitious targets for the sector including increasing overall agricultural output by 33 percent, a 40 percent increase in value added, and a 42 percent increase in exports based on 2007-2009 levels (DAFF, 2010). And despite Ireland’s “significantly high” levels of methane and nitrous oxide emissions (FAO, 2014, p. 90), excessive fertilizer usage ¹ (FAO, 2014, p. 88), and “exceptionally high” cattle stocking rates, (FAO, 2014, p. 44) a primary goal of the FH2020 was a 50 percent increase in dairy production, a trajectory still evident in the successor strategy to FH2020 – Food Wise 2025 (FW2025).

Climate change is now regarded as the single greatest threat to global health in the twenty-first century (Wang & Horton, 2015) and many of the key actions necessary to mitigate climate change fall within the food and agricultural sector (Sage, 2015). Indeed, under the terms of the Paris Agreement (of the UN Framework Convention on Climate Change signed in

December 2015) which sets an upper limit on global warming to two degrees Celsius, the implications for food and agriculture – irrespective of the rapid decarbonisation of the energy and transport sectors - are profound with lower emissions seen as essential. Together with the aspirations for food security and social justice as outlined in the Sustainable Development Goals, suggest that ‘business as usual’ approaches that emphasise output and achieve only modest improvements in efficiency is no longer an option.

The productivist model of agriculture

Irish agriculture policy is greatly influenced by the European Union (EU) and its predecessors which has had a Common Agricultural Policy (CAP) since 1962. Prior to the CAP food was scarce, expensive and choice was limited, hence the goal of a CAP was to increase productivity by providing farm price support (Viaggi, Gomez, Paloma, Mishra, & Raggi 2013). This approach to agriculture is now referred to as the productivist model, one which necessitates priorities of specialisation, intensification and concentration (Walford, 2003). Since joining what is now known as the EU in 1973, Irish farmers have received an estimated €50 billion from CAP funding (Hennessy & Kinsella, 2012). Between the years 2007 and 2013, Ireland received €11.7 billion in CAP funding, with a further 11 billion earmarked for the subsequent six years leading up to 2020 (EC, 2016). Ireland is now the fifth largest net exporter of beef in the world (O’Shaughnessy & Sage, 2017); the supplier of 10 percent of total global infant formula (Allen, 2016), home to three of the world’s leading infant formula producers; and the fourth largest dairy processor in Europe; and holder of 12 percent of the global market in the performance nutrition market (O’Shaughnessy & Sage, 2017). Yet, the Irish farming sector remains characterized by low-income and underemployment whereby only one in three farms are classified as economically viable (Hennessy & Moran, 2014). Despite reforms to the CAP over the past three decades, and criticisms regarding the viability and capability of the productivist model to address the interconnected challenges of the twenty-first century (Lang & Heasman, 2015), it has proven difficult to uncouple European agricultural policies from the productivist model of agriculture (Maréchal, 2012).

Criticisms of the CAP have also been raised regarding equity and that its primary beneficiaries are large farmers and agri-businesses in the more favourable regions (Schucksmith,

Thomson, & Roberts, 2005; Matthews, 2016). If this is the case, then neither the traditional small-holder farmers, the people living in rural areas - on which Ireland relies for its 'traditional' and 'green' image - nor the general public, are winning in the current agricultural system. In addition to environmental and equity concerns, the Irish population experiences significant diet-related health problems, high levels of income inequality and low paid employment (Social Justice Ireland, 2016). Non-communicable Diseases (NCDs) account for almost nine out of ten deaths in Ireland (88%) (WHO, 2014) and poor diet is the number one risk factor in Ireland's total burden of disease, ahead of cigarette smoking and alcohol consumption (Institute for Health Metrics & Evaluation, 2015). Obesity is a major contributor to chronic diseases and 60.1 percent of the adult population is overweight (O'Connor & Staunton, 2014). Future projections indicate a 40 percent overall increase in NCDs in Ireland by 2020 (Balanda, Barron & Fahy, 2010). Indeed, if current obesity trends continue the cost of this problem will be in excess of €4.3 billion per year by 2020 (Keaver *et al.*, 2013). Food insecurity and malnutrition are also persistent problems in Ireland where 13 percent of the population are classified as experiencing 'food poverty' (DSP, 2015). In 2009, the same year FH2020 was being developed, Ireland became a signatory to the Prague Declaration committing governments to tackle the problem of malnutrition- a problem which costs the Irish State €1.42 billion per year in healthcare costs (Irish Society for Clinical Nutrition and Metabolism, 2013).

Methodology and methods

Caraher and Cowburn (2015) argue that new ways of examining the development of policy, the influences on policy, and the role professionals play in shaping policy are needed. Consequently, the objective of this paper is to analyse the FH2020 development process in terms of who was involved in the process and what issues were prioritized. For the purpose of this article policy is defined as "a course of action (and inaction) that affects the set of institutions, organisations, services and funding arrangements...." (Buse, Mays, & Walt, 2005, p6). Although the FH2020 document is labelled as a 'road map', arguably it represents a 'plan of action' and was therefore analysed using a policy analysis approach.

A critical analysis of 107 documents which contributed to the development of the final FH2020 strategy was completed. The documentary analysis focuses on the chronological stages

of development and the identification of the key actors and agendas using Walt and Gilson's (1994) Policy Triangle Framework to frame the analysis (see Figure 2 in supplementary materials). The Walt and Gilson framework is based on a political economy perspective and considers how actors, context, processes and content interact and shape policy-making (Walt *et al.*, 2008). This approach enables 'systematic thinking' (Carey, Caraher, Lawrence & Friel 2015) by shifting the focus from the mere content, or the 'what' of policy, to the actors, process and context - the 'who' and 'how' of policy (Buse *et al.*, 2005). Summative content analysis (Hsieh & Shannon, 2005), was utilised to explore public health related themes throughout all documents. For the purpose of this paper, 'process' refers to the first two stages of the policy making process: initiation and development (Buse *et al.*, 2012).

Data analysis

Four types of documents were used as primary sources of data: (i) Background papers (ii) Discussion papers (iii) Public consultation submissions and (iv) Minutes from the proceedings of four committee meetings. All documents, with the exception of the minutes, are publically available on the Department of Agriculture, Food and the Marine (DAFM) website. Committee meeting minutes were sourced via direct request to the DAFM. The minutes of the final committee proceedings were not provided. All documents were collected between December 2014 and March 2015 and coded using NVivo10 software. Following Walt & Gilson's (1994) Policy Triangle Framework coding focussed on actors, content, context and process. In order to identify key actors and interests, FH2020 committee membership was coded according to type of organization/enterprise/area of interest (see Table 1 in supplementary materials). The findings are set out under three headings: (1) Process and context, (2), Actors, (3) Committee proceedings: context and content.

Results

1. Process and context

A number of events and reports relating to the strategic development of the Irish agri-business sector preceded the publication of the FH2020 report. In 2004, the Agri Vision 2015 Report was published by DAFF with the intention of providing a framework for developing the industry up to 2015. However, in 2009, taking account of “the new challenges” faced by the industry, including the economic recession, the Department viewed it as “an opportune time” to develop a new strategy (DAFF, 2010a, p. 1), primarily under the narrative of feeding the growing global population. The process was initiated in March 2009 by the Management Advisory Committee of the DAFF. Eighteen background papers were developed by the DAFF and five additional Irish government agencies in September 2009. Following a Management Advisory Committee meeting in October 2009, these background papers were distilled into five discussion papers, each with key questions to be considered based on the five papers (see Figure 1 in supplementary material). These papers were intended to inform and guide the public consultation process which opened for a brief period from December 2009 through to March 2010. Public submissions were made via email or post to the Economic and Planning Division of the DAFF and were subsequently categorized under the headings: Cross-cutting Issues/Key Questions, Food & Branding, Environment, Animal Welfare, and Commodities.

An expert committee formed of 31 “senior experts and participants in all aspects of the sector” was appointed by the Minister of DAFF in February 2010 (DAFF, 2010b). In early 2010, Bord Bia, Ireland’s food promotion board, commissioned two Harvard Business School associates to identify new agri-business export opportunities. The outcome of this process, the ‘Pathways for Growth Report’ was published on May 6th 2010 and “key elements were incorporated into Food Harvest 2020” (Bordbia.ie, 2010). In total, eleven months was spent on preparatory work and five months on drafting the strategy

2. Actors

Table 1: Food Harvest 2020 committee structure.

Food Harvest 2020 Committee Membership by Representation		
<i>Representation</i>	<i>Number of representatives</i>	<i>Female/Male</i>
Producer organisations	6	0/6
Food industry	9	0/9
Civil society	3	0/3
Government bodies	9	2/9
Business associations	2	0/2
Academics	1	0/1

At the committee level, the food industry in conjunction with government bodies were the leading sectors involved in the formulation of the FH2020 strategy. Civil society representation was limited to three representatives within a predominately male committee (Table 1). Only two seats were allocated to represent environmental concerns and were filled by the Environmental Protection Agency, a statutory body and Birdwatch Ireland, a civil society organisation. Two additional civil society organisations formed part of the committee; SIPTU, a trade union and Macra Na Feirme, a youth farming organisation. Neither the Department of Health nor any other public health agency had a representative appointed despite what could be considered an obvious interest in the policy area. The pharmaceutical industry (Abbott Ireland) however, did have a seat at the table (see Table 1 in supplementary material)

Table 2: Public consultation submissions according to Sectors

	Cross-cutting issues/Key questions	Food & Branding	Environment	Animal Welfare	Commodities	Total
Individuals	2	2	0	32	3	39
Civil society	2	2	2	0	2	8
Producer organisations	7	0	1	0	5	13
Food industry	1	0	0	0	5	6
Business associations	1	1	2	1	0	5
Government bodies	2	1	1	0	0	4
Political parties	1	0	0	0	0	1
Academic institutions	0	1	0	0	5	6
Total submissions	17	7	6	33	20	

In total, 83 public submissions were received and as indicated in Table 2, the vast majority were submitted by individuals in relation to animal welfare with a specific request to end the export of live animals. ‘Commodities’ was the second largest category with a total of 20 submissions from a range of contributors. The category with the least number of submissions was ‘Environment’. After individual submissions regarding animal welfare, producer organisations featured most prominently, accounting for a total of 13 submissions. Numerous producer agencies took the opportunity to submit multiple times in the public consultation process. Many producer and food industry organisations, and business organisation, such as the Food and Drink Industry Ireland (FDII), the Irish Farmers Association (IFA), the Irish Dairy Board (IDB) and the Irish Milk and Creamery Milk Suppliers Association (ICMSA), also availed of the process to submit their view even though they were already represented on the committee (see Figure 1 in supplementary materials).

3. Committee proceedings and content.

The expert committee was appointed four months prior to the June 1st deadline for completion and one month prior to the end of the public consultation. Government agencies: DAFF, Bord Bia, Teagasc and Enterprise Ireland (see Table 2 in supplementary material) prepared the initial drafts of the FH2020 to “aid smooth running” of the process. The expert committee met for the first time on March 8th and had four meetings on the following dates in 2010: March 23rd, April 13th, and May 4th. The minutes of the proceedings of the last meeting was not made available. The initial meeting laid out the terms of reference and highlighted that the analytical framework had already been completed. The minutes of the second meeting, March 23rd, referenced the importance of including “easy wins” while providing a stronger basis for the belief that the Irish agri-food sector will assist economic recovery in addition to “supporting the view that world population growth will assist Irish Produce”. A target of 20-30 percent or higher for dairy output by 2020 was noted. “Access to GMO/new science” was seen as crucial for the survival of the feed industry and beef, lamb, aquaculture and dairy were highlighted as offering “significant opportunities” with regard to organic production. The Prepared Consumer Food sector was identified as an area that could grow by 50 percent by 2020. The view that all food related and publically funded research and development should have commercial input and output metrics was also expressed.

The minutes of the 13th of April meeting suggested a 20-25 percent increase in dairy output, 20 percent increase in beef production, 45 percent in pigmeat and 30 percent for sheepmeat. Recommendations for value-added products included a 50 percent growth target reliant on reducing overall cost base by 20 percent through the reduction of labour, energy and regulation costs. It was accepted that “the industry itself could do much more to reduce labour” and it was suggested that “a review of the minimum wage was necessary” to address the labour cost imbalance. The 4th of May proceedings again stressed the importance of framing the strategy in a positive light. The major environmental issues within the strategy were highlighted as an area that needed to be addressed, and forestry was suggested as a potential opportunity to off-set increased emissions from greater agri-production. It was also queried at this point, as to whether a Strategic Environmental Assessment (SEA) was needed prior to publication.

With regard to increasing production while lowering emissions, the “aim will be to reduce emissions/kg of product”. Acknowledging animal health as a marketing tool was suggested and verifying Ireland’s sustainability claims was regarded as “critical”. Food in terms of health and wellness was noted as a marketing tool and the ‘Food for Health’ initiative, which emphasises the health properties of dairy products, was highlighted as “a good example that could be replicated”. The image of dairy products, with particular reference to saturated fats, was also highlighted as an area in need of improvement.

Discussion

The role of industry and producer organisations

The strategy was presented as an ‘industry led’ initiative (DAFF, 2010) yet four government agencies prepared the initial drafts of the strategy prior to the first committee meeting. Taking into account the full development process, it would be more accurate to label it as a joint government and industry led initiative. Lang and Barling (2012) highlight that states are no longer key players in the decision making arena now dominated by corporations. In this case, the state was a key player in the decision-making process but with goals strongly aligned with industry interests. Only two committee seats were afforded to the environmental sector, and while Ireland’s birds and habitats had one representative on the committee, population health interests had no representation in the almost exclusively male committee. An important finding of this study is the degree to which industry related concerns were lobbied and progressed at each step of the process, including during the public consultation. On the other hand, the Environmental Protection Agency, did not make any submission in what turned out to be the weakest section of the public consultation with only six submissions. Very few independent organisations participated in the public consultation process, and the majority of those that did, were already represented on the committee (see Figure 1 in supplementary materials). This arguable ‘double influence’ may be a reason to carefully scrutinize the membership of participant associations - an observation echoed in Friel *et al.* (2016). Indeed, board membership of some key government agencies replicates that of FH2020’s committee structure, with Teagasc’s Board comprising representatives

from the Irish Farmers Association, DAFM, Irish Cooperative Organisation Society, Irish Creamery Milk Suppliers Association, Pharmabiotic research, and PepsiCo; (Teagasc, 2016a). A similar pattern is evident in Bord Bia's board membership (Boardbia, 2016a) and raises questions as to the existence of 'golden circles' of people and organisations which support and facilitate each other. Arguably, to further an ecological public health approach and to ensure health in all policies, public health representatives ought to be on the boards of these organisation and associations.

A healthy economy versus a healthy population

A total of 25 documents contained references to public health, eight of which were background and discussion papers. The context of these references can be summed up as follows (i) improving animal health to protect human health, (ii) functional foods for health, (iii) health marketing, (iv) global food security and (v) managing environmental contaminants. Conversely, public submissions from non-industry related organisations took a more holistic view in favour of altering the food system to suit the needs of the environment and people with emphasis placed on local markets, local food production and access to safe and healthy food. Obesity was not a prominent feature in any documents and was labelled as 'a national obsession' in the Pathways for Growth report (Bell & Shelman, 2010, p. 25). With the exception of public submissions and the background paper entitled 'Horticulture', the relationship between food, public health and agriculture was illustrated primarily in terms of the market value of promoting specialized foods and merging the food and pharma sector. Unmodified food as a means to health was not considered and food security was only contextualized in terms of ensuring food production to meet increased global demand for animal based products.

Despite climate change potentially being the largest global health threat of the twenty-first century (Watts *et al.*, 2015), closely linked to diets as the leading cause of death in the twenty-first century (Forouzanfar *et al.*, 2015), the primary threat identified in terms of population health were zoonotic disease and contamination. Despite numerous concerns regarding reducing GHG emissions, increasing animal production was justified in the background document 'CAP post 2013' by arguing that should production decrease to meet climate change concerns, 'less efficient systems' would fill the gap. This view was shared by the Irish Farmers Association who also championed the efficiency argument, purporting that Ireland produces dairy and meat more

‘efficiently’ than other countries. Yet, levels of GHG emissions continue to rise (Environmental Protection Agency, 2013) - an expected and accepted opportunity cost of FH2020. As stated in the committee meetings, Ireland’s aim was to reduce emissions per kg of product, a fallacious objective in the context of steeply rising agri-food output targets.

Absence of public health advocates.

While it is not expected that food businesses would consider it within their remit to advocate for public health (Friel *et al.*, 2016), the opposite is true for public health agencies. Yet, only one public health related state agency, SafeFood² made a connection between this strategy and human health. Ironically, Ireland’s Institute of Public Health, an institution focussed on “influencing public policies in favour of health” (Institute of Public Health, 2016) did not participate in the process, despite hosting a conference in February 2010, one month prior to the close of the public consultation process, on the effects of climate change on public health (Institute of Public Health, 2010). The clear absence of public health advocates signals a much larger crisis in the field of Irish public health and health promotion, both in terms of where prevention efforts are aimed and in the competence and or lack of willingness to engage at the level of national strategy development on the broader determinants of health.

The food industry’s role in influencing policy formulation relating to food and health has been well documented (Swinburn *et al.*, 2011; Smith, 2013; Goldman *et al.*, 2014; Panjwani & Caraher, 2014; Nestle, 2014; Williams & Nestle, 2015; Carey *et al.*, 2015; Bodker *et al.*, 2015; Friel *et al.*, 2016). In contrast, at least in this case, there is little evidence of public health professionals’ engagement with the development of this food strategy. On the other hand, the agri-food industry is an active and powerful agent in Ireland’s public health strategies. For example, the same year that FH2020 was being developed, the report of the Irish Inter-sectoral Group on the Implementation of the Recommendations of the National Task Force on Obesity was released. It stated that merely “promoting access to healthy food” was “not possible” by the agri-food industry “due to legal constraints” and “competition rules” (Department of Health & Children,

2009, p 14). Throughout FH2020's development, the link between the Irish agricultural industry and Ireland's food landscape or indeed the link between the environment and public health was largely ignored. Where public health concerns were expressed in the public consultation process, these views did not transpire in the proceedings of the committee meetings. Even with the EPA on the FH2020 committee, the question as to whether a Strategic Environmental Assessment was needed did not arise until less than one month prior to finalising the strategy, which in itself raises questions.

A 'business as usual' approach

The economic priorities of specialization, intensification and concentration were continuous themes throughout the proceedings of the committee meetings. Similar to the background and discussion papers, in these proceedings, the FH2020 strategy was framed as a business tool for economic recovery, economic growth and job creation. Considering that increased employment opportunities is cited as one of the many benefits of FH2020 (DAFF, 2010) it is worth pointing out that the highest risk of low paid employment in Ireland is in the agricultural, forestry and fisheries sectors, and the accommodation and food sectors (Joint Committee on Jobs, Enterprise and Innovation, 2015, p 21). Ireland has the highest incidence of low paid full time employment in the EU15³, and two thirds of these employees live below the poverty line (Joint Committee on Jobs, Enterprise and Innovation, 2015). Nonetheless, reviewing the minimum wage- which implies a lowering of the hourly minimum so that industry can compete internationally was still suggested - highlighting the need for a more comprehensive analysis of the employment opportunities and conditions associated with Ireland's agricultural sector. Furthermore, the economic recession hit non-dairy farmers the hardest, yet dairy production was a key focus of FH2020.

Similar to the background and discussion papers, it was also evident in these proceedings that reducing GHG emissions was framed as being reliant on a possible expansion of forestry, a technical fix, or a simple change of measurement. Also worth reiterating is the reference to the 'Food for Health' initiative of which the primary focus is on dairy food only, in addition to the call for commercial input and output metrics in all publicly funded food research. This brings to light the many ethical issues associated with using public funds to pursue commercial interests, particularly in relation to one of

the most fundamental health determinant, food, when there are clear conflicts of interests. Ireland has no formal policy statement outlining its current food security situation or the impact of the recession on population health which almost certainly reduced food quality (Wilde, 2011). In 2010, one in ten people were classified as experiencing food poverty, a number that has grown to one in eight since (Department of Social Protection, 2015) and it is highly unlikely that the people who cannot access basic food items due to cost, could afford the more expensive, 'functional' food items. Similar to Street's (2015) questioning of the corporate promotion of nutraceuticals above a balanced diet, in this context it is worth questioning the extent of the additional health benefits offered in, for example, calcium enriched dairy products as opposed to a non-animal, refined product, particularly if public funding is being used to finance such research. Mirroring international policy trajectories, the Irish agricultural industry was presented as what Neuwelt, Gleeson and Mannering (2015) refer to as 'economic saviours' – a difficult position to maintain, and an impossible position to further in the context of ecological public health goals.

Conclusion

Food Harvest 2020 was developed by a limited number of food industry professionals and government agencies focussed entirely upon food as a tradable commodity stripped of any health considerations outside that of health marketing, functional foods, and traditional food safety concerns. Participation beyond that of industry and producer organisations was minimal, and public health engagement in the process was minute. Positioning public health in the food and agricultural policy frame is essential to change the terms of debate - an impossible task in the absence of public health engagement, or indeed without stronger links and understanding between public health advocates and environmental advocates. Engaging in the policy process offers public health and environment professionals an immense opportunity to advance an ecological public health perspective, which they have a responsibility to do if environmental and diet-related trends are to be reversed. Food policy is critical to public health and the sheer absence of public health voices throughout the FH2020 process indicates a distinct blind-spot in Ireland's public health landscape, a silo mentality, and a clear disconnection between government, people, food, health and the environment; a situation reflective of the broader international trends.

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Notes

¹During the period of 2002 to 2011 when EU countries had reduced their fertilizer use from 116kg per hectare to 109 kg per hectare, Ireland was singled out as the heaviest user of fertilizer during this period, applying over 393 kg of nitrogen and phosphate fertilizer per hectare in 2009 alone (FAO, 2014, p. 88)

² Safefood is an all-Island implementation body with 'a general remit to promote awareness and knowledge of food safety and nutrition issues on the Island of Ireland' (Safefood, 2016)

³Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, Netherlands, Portugal, Spain, Sweden, United Kingdom.

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