

Submission to the Consultation on a new National Obesity Strategy in Ireland

Feminist Communities for Climate Justice

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This submission has been prepared by *Feminist Communities for Climate Justice*, a joint project between the National Women's Council of Ireland and Community Work Ireland.

National Women's Council

The National Women's Council of Ireland (NWC) are the leading national representative organisation for women and women's groups in Ireland, founded in 1973. With nearly 200 members, the ambition of the National Women's Council is an Ireland where every woman enjoys true equality and no woman is left behind. NWC's current Strategic Plan No Woman Left Behind prioritises the need for NWC to bring a new focus on the climate crisis, its impact on women, the need for a Just Transition and the need for women and women's organisations to play a more central role in development of policies and solutions to meet the challenge of our climate crisis.

Community Work Ireland

Established in 1981 as the Community Workers Co-operative, Community Work Ireland (CWI) is a national organisation that promotes and supports community work as a means of addressing poverty, social exclusion and inequality and promoting human rights. CWI has a membership base of almost 900 community workers and community work organisations working with the most marginalised communities throughout the country. CWI has been involved in the area of climate justice since 2010.

Feminist Communities for Climate Justice

Feminist Communities for Climate Justice campaigns for climate justice that reflects feminist and community work values. We mobilise communities, ensuring social inclusion and equality are central to climate policies and programmes. This partnership between the National Women's Council (NWC) and Community Work Ireland (CWI) amplifies the voices of women and marginalised communities that are most impacted by climate change, building momentum in communities to engage, understand and influence climate policies. Feminist Communities for Climate Justice will develop a feminist and community work analysis, has delivered an accredited training programme in partnership with the Department of Applied Social Studies at Maynooth University, has established a Feminist Communities for Climate Justice National Network, and has developed resources and campaigns around feminist climate justice including two toolkits.

About the Consultation:

Obesity is a complex disease and in 2025, 56% of people in Ireland live with overweight or obesity. The Department of Health is developing a new National Obesity Strategy to enable healthier living and improve supports to prevent and treat overweight and obesity. The new strategy will build on the previous Obesity Policy and Action Plan.

The Department of Health are seeking the views and opinions of the public on the key objectives for the new strategy and possible approaches to achieve them. The views and opinions collected will be considered and used to inform the further development of the strategy.

This submission is informed by the work of the Feminist Communities for Climate Justice (FCCJ) project which is a joint initiative of the National Women's Council of Ireland and Community Work Ireland. The project, funded by the Department of Climate, Energy and Environment's Community Climate Action Programme (Strand 2), aims to educate, empower and mobilise women, community workers and disadvantaged communities so that they can participate in climate policies and actions.

In addition to our national network meetings, the FCCJ has two relevant working groups: the Policy and Advocacy Working Group and the Local Food working group that runs in conjunction with the Talamh Beo Women's Group. In this submission we wish to highlight the interconnectedness of public health, social justice, food systems, and environmental sustainability. We advocate for a new approach to food systems and healthy communities that considers human wellbeing in its widest sense, and through a feminist and community development lens. We propose that a new National Obesity Strategy must adopt a holistic, multi-sectoral approach that addresses the root causes of obesity, including a broken food system that disproportionately affects marginalised communities.

1. A new approach is needed that addresses food poverty

The current policy, "A Healthy Weight for Ireland: Obesity Policy and Action Plan 2016-2025," notes that further action is needed to achieve a meaningful reduction in prevalence of obesity. The trends are truly alarming: levels of overweight and obesity in Ireland have doubled in the past two decades among adults, and one in four children are overweight or obese. Only 40% of the population has a healthy weight. This new strategy offers a critical opportunity to move beyond a purely health-focused perspective and integrate food systems, social justice, and environmental considerations into a coherent, all-of-government response to obesity and overweight.

The FCCJ baseline study published in 2024 analysed, *inter alia*, the health impacts of climate change on women and marginalised groups through a feminist and community work lens.¹ The

¹ https://www.nwci.ie/images/uploads/NWC_CWI_FeministClimateJusticeReport_Web_%28compressed%29.pdf

project advocates for climate actions and an analysis of climate policy, with a particular focus on marginalised and disadvantaged communities, including members of the Traveller community, women, low income groups, migrants, lone parents, disabled people, older people and people facing barriers to full participation in Irish society, on the basis of their identity or vulnerability. Just as energy and transport poverty is affecting many of these marginalised groups, so too is food poverty as food prices continue to rise at levels well above the general inflation rate.² In addition, marginalised and disadvantaged communities are often particularly exposed to or vulnerable to various forms of environmental pollution and injustice, including food injustice, along procedural, distributive and recognition dimensions, all of which make it more difficult for such groups to participate in decision-making.³

Food poverty is one area where environmental and climate injustice impacts on marginalised groups. Ireland is now one of the wealthiest countries in Europe, yet the prevalence of food poverty is increasing, according to the 2023 SILC data which informed the CSO's reporting on SDG2 - Zero Hunger.⁴ 2.4% of the population were considered to be in "severe" food insecurity in 2024, and as the cost of living continues to rise, this percentage could increase further in 2025. While food poverty might seem only tangentially relevant to overweight and obesity, there is a strong correlation between poverty generally and lack of access to affordable, healthy foods, as well as rates of obesity and poor health. Any strategies to tackle obesity and overweight should, as a priority, address food poverty in tandem.

Recommendations:

1. The new strategy should include measures to address the root cause of food poverty, which is income inequality. We support the call for changes in social welfare and other DSP payments to a level that would enable recipients to access a healthy, sustainable diet and enjoy wellbeing and a good quality of life. The provision of food supports, whether in the form of vouchers or food parcels must offer choice and dignity to recipients. In the long term,

² <https://www.rte.ie/news/business/2025/0710/1522849-sharp-rise-in-food-and-drink-prices-over-past-year/>

³ <https://communitylawandmediation.ie/wp-content/uploads/2022/03/Environmental-Justice-in-Ireland-230322-1.pdf>

⁴ <https://www.cso.ie/en/releasesandpublications/ep/p-sdg2/irelandsunsdgs-goal2zerohunger2024/hunger/#d.en.455491>



national-level measures like a universal basic income should be considered to ensure households have sufficient income for nutritional needs.

2. To address and reverse food poverty, policies should seek to create a healthier local food environment for all. The strategy should include pilots to explore the establishment of "no fry zones" near schools to limit access to unhealthy food and social supermarkets or community pantries to provide affordable, healthy food options.
3. The strategy should ensure that all existing and new supports are truly accessible to those who need them. There may be a need to improve awareness of and access to existing food support services. This can be achieved through better collaboration and coordination among local services, as well as by diversifying advertising methods beyond just online platforms to reach vulnerable groups like older adults.
4. Food banks may help to alleviate immediate need, but they are not necessarily a good long-term intervention or solution to food poverty. Some charitable organisations have moved away from the food bank model in favour of a "casework" approach. Their strategy focuses on providing long-term support by addressing the underlying causes of food poverty, such as financial instability, while still offering immediate food assistance. This model aims to empower people and reduce the stigma and dependency often associated with traditional food banks. Government policies should support the concept of "social supermarkets" which is common in Northern Ireland, food hubs and fresh food markets instead.
5. Organisations like MABS are part of the wraparound support services needed to address the financial issues that underpin food poverty. We recognise in the FCCJ project that food poverty is a product of poverty and that efforts to improve food security must address the broader context of a lack of income and competing budget demands from other household bills. MABS should be a key ally in the efforts to address food poverty, and they should be adequately resourced to provide support and information about how to eat well on a low budget.

2. Obesity and climate change

The current global food system, while successful at producing enough food to prevent mass starvation, has also made people "heavier and sicker" while causing devastating environmental damage. It relies heavily on inputs of fertilisers, pesticides and freshwater, the consumption of which is putting critical planetary boundaries in jeopardy.⁵ This system is responsible for 23-42% of global greenhouse gas (GHG) emissions and perpetuates inequality and food insecurity.

Modern diets, especially in wealthier nations, are high in red and processed meats, sugar, salt, and fat, and low in plant-based foods. This dietary pattern is a leading risk factor for diet-related chronic diseases like cardiovascular disease, type 2 diabetes, and obesity. At the same time, the production of these diets, particularly from a livestock-heavy system, is a major source of GHG emissions, land use, and water pollution.

The overconsumption of food, which fuels the obesity epidemic, also leads to environmental waste. Globally, around a third of all food produced is wasted, which squanders the land, water, and energy used to produce it. Decomposing food waste also contributes to the production of methane which is a highly potent greenhouse gas. The "Fixing Food Together" report⁶ estimates that Irish households alone produce a quarter of the country's food waste, costing approximately €700 per year per household.

The overconsumption of ultra-processed foods is a feedback loop. Humans are biologically conditioned to seek out calorie-dense foods, and the food industry exploits this by creating and marketing hyper-palatable products. This leads to increased consumption and higher rates of obesity, which in turn increases the environmental footprint of the average person's diet. This phenomenon has been described in great detail by researchers, who have found no benefit to human health whatsoever in ultraprocessed foods.⁷ Yet their prevalence and associated health

⁵ Richardson, K., Steffen, W., Lucht, W., Bendtsen, J., Cornell, S.E., Donges, J.F., Drüke, M., Fetzer, I., Bala, G., Von Bloh, W. and Feulner, G., 2023. Earth beyond six of nine planetary boundaries. *Science advances*, 9(37), p.2458. <https://www.science.org/doi/abs/10.1126/sciadv.adh2458>

⁶ <https://ide.ie/wp-content/uploads/2023/09/fixing-food-together-climate-health-alliance.pdf>

⁷ Elizabeth, L., Machado, P., Zinöcker, M., Baker, P. and Lawrence, M., 2020. Ultra-processed foods and health outcomes: a narrative review. *Nutrients*, 12(7), p.1955. <https://www.mdpi.com/2072-6643/12/7/1955>



impacts are increasing, not decreasing, and national policies to date have struggled to arrest this worrying trend.

The new obesity strategy should acknowledge the multi-faceted nature of obesity, including environmental factors, access to healthy and affordable food, and socio-economic status. It should recognise that levels of overweight and obesity are significantly higher among disadvantaged groups, and that the sociodeterminants of health should be considered when designing any interventions. However, to truly address this public health challenge, a more radical approach is necessary including measures that target the activities of processed food producers and retailers to improve food security, affordability and the availability of healthy food choices.

A "whole-of-government" approach is needed, with sustained political will to resist the growing influence of the food industry over food policy. Policies to lower overweight and obesity should also empower individuals and communities to make healthier choices by transforming the food environment around us and giving every child from the earliest age the best possible start in life through breastfeeding following WHO guidelines, and access to an affordable diet that is local, fresh, affordable and varied as well as nutritious. The recommendations below largely mirror those of the "Fixing Food Together" report by the Irish Climate and Health Alliance:

Recommendations:

1. End the junk food cycle by addressing the pervasive presence and marketing of ultra-processed foods that are high in fat, sugar, and salt (HFSS) through effective tax, labelling, regulatory standards and public education initiatives. Move beyond the "consumer responsibility" model and use mandatory regulations to create a level playing field to allow smaller-scale, local healthy food producers compete with multinationals.
2. Promote the transition to a plant-based diet consistent with the EAT-Lancet Commission's recommendations: climate change and the biodiversity crisis require a dietary shift away from excessive consumption of red meat and dairy towards a diet rich in plant-based proteins, fruits, vegetables, and whole grains. The current Irish diet's greenhouse gas (GHG) emissions exceed planetary boundaries by a staggering 226%. Almost half of Ireland's dietary GHG emissions come from animal food products, with red meat being the largest

contributor. All relevant Irish health, food and environment agencies should be actively promoting a plant-based diet for health and environmental reasons.

3. Regulate food producers: Publish a Public Health (Obesity) Bill with provisions for online and television advertising bans on unhealthy foods. Introduce legislation to make the removal of HFSS foods from checkouts and end-of-aisle displays mandatory. Implement "no fry zones" near schools and use zoning laws to promote healthy food outlets in underserved communities.
4. Expand the existing sugar-sweetened drinks tax to include a wider range of ultra-processed foods, using the revenue to subsidise healthy, sustainable foods. Use financial incentives and planning regulations to support the establishment of new supermarkets and markets in underserved communities.
5. Procurement: Integrate sustainability criteria into food procurement for public institutions like schools and the HSE. Ensure adequate funding for sustainable and health school meal programmes using local produce where possible, and minimising packaging waste, and implement a mandatory Healthy Food Policy for all schools and hospitals.
6. Launch mass media campaigns that promote healthy and sustainable diets, and restrict advertising of unhealthy foods. Update the training curricula for healthcare professionals, farmers, and teachers to include planetary health and sustainable food systems. Scale up effective community programs with a focus on disadvantaged areas.

3. Ireland's agricultural model and its environmental impact

While agricultural policy may not be the main focus of this strategy, the dominance of the livestock sector in Ireland and its considerable environmental impacts across water, biodiversity, climate and air means that the government's policy of supporting intensive agricultural production for export should be reviewed as part of this obesity strategy. Such a review should prioritise sustainability, affordability, dietary considerations that align with planetary and environmental boundaries.⁸ In addition, no approach to addressing obesity or healthy diets could be complete without a

⁸ <https://swanireland.ie/wp-content/uploads/2021/11/Towards-a-New-Agricultural-and-Food-Production-Policy-for-Ireland.pdf>

transparent account of the influence of marketing strategies by the livestock industry and food retail sector.

Ireland is a major exporter of beef and dairy products, and the agri-food industry claims to be committed to sustainability while agri-related pollution continues to be a serious threat to Ireland's waterbodies.⁹ Agricultural greenhouse emissions contribute over a third of Ireland's annual emissions, which is very high by EU and OECD standards. While other EU member states are addressing pollution from intensive farming with destocking, diversification and other measures, no such strategies have been deployed at scale by the Irish government. The government advisory agency Teagasc has even given its backing to the controversial "Dublin Declaration" that advocated for dietary red meat consumption, in stark contrast to the recommended intakes in the EAT Lancet diet.^{10,11}

With a high dependence on livestock systems and continuing dairy intensification, the Irish agricultural model is designed chiefly to supply export markets, not food system security, sustainability or affordability in Ireland or even the continuance of the traditional family farming system. Furthermore recent evidence suggests a network of influence between agribusiness and policymakers which points to the potential of regulatory capture in the sector generally.¹² None of this is irrelevant to the issue of food systems and the food environment. Dietary advice through public health promotion campaigns has to compete with the advertising and branding campaigns of the meat and dairy sectors who, from the public's point of view, seem to convey the opposite message that diets high in meat and dairy are both sustainable and healthy. It is no surprise that the Advertising Standards Authority of Ireland (ASAI) which regulates industry advertising has upheld complaints against misleading statements about the sustainability of Irish milk production in 2023 and 2024.

⁹ <https://www.epa.ie/news-releases/news-releases-2025/early-insights-into-river-nitrogen-levels-indicate-an-increase-in-the-first-half-of-2025.php>

¹⁰ <https://www.rte.ie/news/business/2024/1231/1488626-dublin-declaration/>

¹¹ Willett, W., Rockström, J., Loken, B., Springmann, M., Lang, T., Vermeulen, S., Garnett, T., Tilman, D., DeClerck, F., Wood, A. and Jonell, M., 2019. Food in the Anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems. *The Lancet*, 393(10170), pp.447–492. <https://www.thelancet.com/commissions-do/eat>

¹² <https://www.desmog.com/2024/09/25/mapped-ireland-powerful-farming-lobby/>



While Ireland lays claim to being the second most food secure country in the world, ranking behind Finland out of 113 countries according to the Global Food Security Index 2022, over 80% of the fresh fruit and vegetables actually consumed in Ireland are imported. It seems we are only as food secure as we have high enough incomes to import the food we need. To respond to the biodiversity and climate crisis Ireland must urgently become more self-sufficient in fresh produce besides meat and dairy, and healthy sustainable diets based on locally produced food need much greater focus and promotion in public health and environmental communications.

It is ironic that in a biodiversity and climate crisis, declared by the Dáil in 2019, the Irish horticulture sector is experiencing continued and significant decline, primarily driven by the energy crisis and high production costs, the dominant power of retailers leading to below-cost selling, and difficulties in attracting and retaining skilled labour. This combination of factors is forcing growers out of the market, reducing the number of field vegetable, fruit, and nursery stock producers, and threatening the availability of fresh, local produce.

Recommendations:

1. The government must recognise the impact of the Irish agricultural model on ecosystem and human health including overweight and obesity both nationally and globally, with a review of the Food Vision 2030 policy. A new policy should end dairy expansion and implement nitrogen loading restrictions on a catchment basis to bring Irish water bodies into good ecological status in line with the Water Framework Directive targets and requirements.
2. Generate policies for the livestock sector including that bring Irish agricultural emissions into line with the sectoral emissions ceiling for greenhouse gas emissions by 2030 and associated carbon budgets without relying on speculative technologies, carbon offsetting or unofficial methane metrics.
3. The practice of state funding and resources of the Department of Foreign Affairs earmarked to promote Irish meat and dairy products abroad, especially to regimes in the Middle and far East with questionable human rights records, should be ended. Efforts should be diverted into promoting small-scale producers of sustainably and organically produced food consistent with a healthy and sustainable diet.

4. Farmers must be given the information and incentives to diversify into local sustainable food production consistent with healthy and sustainable diets including organic farming, agroecological methods, horticulture, tillage, forestry and other on-farm enterprises.

4. Build a Local Food System for Public Health

A key component of the new strategy should be a concerted effort to support local food production and shorter supply chains. The current food system, dominated by long, industrialised, and often subsidised supply chains, combined with lax planning rules that facilitate fast food outlets and the proliferation of cheaper, unhealthy and processed food in supermarkets is a major contributor to the obesogenic environment. The strategy should aim to improve access to nutritious food from local, agroecological food systems that provide fresher, nutrient-dense foods directly to communities.¹³ A policy framework that supports these systems would mean that high-quality, healthy food is more accessible and affordable for everyone, especially for low-income and marginalised groups who are most at risk of obesity.

The "A Healthy Weight for Ireland" report highlights the interdependencies between health and other policy areas, such as agriculture, social protection, and local government. A new policy should explicitly link public health outcomes with the development of a resilient local food system. For example, the Talamh Beo proposal for a "Local Food Producer" status, which would provide direct payments to farmers selling into local markets, would incentivise the production of healthy food where it is most needed.

The Open Food Network¹⁴ is a global network of people and organisations working together to build a new food system. Together, the network members develop open and shared resources, knowledge and software to support a better food system. The OFN flagship project is an open source software platform that makes it easy to create innovative, independent and values-based community food enterprises (Community Food Hubs). The platform can be used by farmers setting

¹³ <https://talamhbeo.ie/projects/local-food-policy/>

¹⁴ <https://sustainable.ie/enabling-short-food-supply-chains/>



up their own online stores, but it is specifically designed to help farmers collaborate and sell together via local Hubs.

The platform was deployed in Ireland in late 2020 and is community owned by a non-profit cooperative since 2021. The software is free to use up to a sales threshold of €500/month, and costs 2.4% of turnover thereafter. The global team of developers ensure that the software is updated on a regular basis with these rolling out to the various country instances on a weekly basis. Producers may choose to sell their produce directly, and/or via one, or indeed multiple Hubs, if that network exists. The added efficiency for producers is that they can manage harvest or production in line with demand by ensuring customers order and pay upfront. This eliminates waste at this point of the supply chain and alleviates a lot of the risk that can be involved with trading at traditional markets, where footfall can be very variable depending on weather or other outside factors. The Hub drop-off model is also very time efficient for small producers who can't afford to spend a lot of time away from the farm staffing a stall or delivering door to door.

This is exactly the kind of project that the government should be supporting with incentives for producers and growers to participate. Without proactive policies, farmers' markets and other direct sale methods will dwindle in comparison to the powerful supermarket sector. Even in France, less than 30% of fresh fruit and vegetables produced locally is now sold locally. The advent of large supermarket and retail dominance means that smaller producers who tend to have the lowest environmental impacts with lowest inputs, are forced to lower their costs of production and earn a tiny percentage of the value chain.

While the trend of fewer, larger companies dominating global value chains, from production to retail, through mergers and acquisitions cuts out smaller producers, it also has implications for food sovereignty and food security. Climate change also poses a severe threat to food systems. Similarly, the current food system's reliance on ultra-processed foods and vulnerable supply chains negatively impacts socioeconomically disadvantaged communities, contributing to food and energy poverty. A new strategy must address these inter-related forces head-on by prioritising policies that empower disadvantaged socioeconomic groups to enjoy access to locally produced, affordable, healthy and sustainable food and by fostering the creation of short, local links from producers to consumers.

Recommendations:

1. Implement a "Local Food Credit" top-up for people on low incomes to purchase from local food producers, as proposed by Talamh Beo, recognising the potentially significant rural employment potential as well as opportunities to support rural households with fresh, nutrient rich dietary ingredients.
2. Support Talamh Beo's call for institutional recognition of small-scale producers, which would allow them to benefit from targeted direct payments and other financial, research and advisory supports for local food production.
3. Support community food hubs, community gardens and market trading areas to create accessible points for local food distribution, as advocated by Feeding Ourselves and Talamh Beo. Consideration should be given to Talamh Beo's recommendation to establish of Community Food Hubs that each have a Local Food Facilitator who works to build links between farmers and consumers. Community food hubs would include representatives who are local food producers, and they could organise public procurement for local producers as part of a community wealth building strategy
4. Require local authorities to provide land for allotments and community gardens. Climate action, environmental awareness and biodiversity officers within local authorities should be given a mandate to develop a local food policy and support the establishment of local community food hubs, farmers' markets and give sustainable and local procurement advice to businesses and the public sector. Local authorities should fund Local Food Facilitators to set up and support short supply chains by linking farmers to consumers and providing spaces for distribution.
5. Prioritise local food producers in food procurement guidelines and strategies, especially for the school meals programmes. Plant-based diets consistent with the EAT-Lancet guidelines should be the basis for all public sector procurement.
6. Ensure that every local authority area has a HSE Healthy Communities programme and staff team that includes a nutritional advisor. Such programmes should offer both nutritional advice as well as monitor levels of food poverty, overweight and obesity on a local level with

a view to offering information, cookery classes and community-based interventions to support healthy and sustainable diets.

5. Create healthy food environments for all

The argument for tackling the unhealthy food environment before focusing on individual behaviour change is a central theme in public health research on the social determinants of health. The evidence suggests that a person's surroundings and socioeconomic context are powerful drivers of health outcomes, often outweighing individual choices.

The food environment, defined as the accessibility, availability, and affordability of food, plays a crucial role in shaping a person's diet. Academic research from a social determinants of health perspective highlights how this environment has become "obesogenic"—promoting weight gain and hindering weight loss. Unhealthy, ultra-processed foods (UPFs), which are high in fat, salt, and sugar, dominate shops, schools, and advertising. A staggering one in five children in Ireland is living with overweight or obesity, and the food environment is a key reason for this.

The "Spinning Plates" report on food poverty in Ballyfermot and Cherry Orchard, Dublin, provides a crucial, community-level perspective that should directly inform the new National Obesity Strategy. The report's findings demonstrate that the issues of food poverty and poor diet are deeply intertwined with economic and environmental factors.

The report unequivocally identifies affordability as the single most important determinant of food poverty in the study area. For many residents, healthy food is simply too expensive, and they are forced to prioritise rent and bills over nutritious groceries. The average weekly grocery spend for those experiencing food poverty is lower than for other groups, yet they report a higher frequency of worry about having enough food.

The local food environment in some disadvantaged communities is characterised in the report as obesogenic, and as a "food swamp," with an abundance of takeaways and convenience stores compared to outlets with healthier options. Ballyfermot for example has 21 takeaways, and in some areas, there are 11 unhealthy food outlets for every one healthy one. The report highlights that this

environment makes unhealthy food choices more convenient and readily available, particularly for children and teenagers.

Access (and thus transport poverty) is a challenge for some. While a majority of residents use a car to get to supermarkets, for groups like older adults and those in Cherry Orchard, transportation is a major barrier. Cherry Orchard is categorised as a "food desert" due to the distance to supermarkets, forcing residents to rely on more expensive local convenience stores and pay a "poverty premium" for their groceries. The report recommends that interventions must address root causes of food poverty and obesity. Short-term interventions like food banks, while necessary in the short term, are not a long-term solution and they deprive users of food choice, or control over what they eat. Very often the products available at food banks are themselves not particularly healthy foods. A sustainable solution requires addressing income inequality, improving local food retail options, and increasing collaboration among local services. The establishment of a "food poverty alliance" is recommended to coordinate a multi-agency response.

Some additional factors that contribute to unhealthy food environments include:

- *Targeted marketing:* Marketing and promotions for unhealthy foods heavily target young people and their parents, making these items difficult to avoid and a part of everyday life rather than an occasional treat. For instance, a local survey found that 100% of schools in Ballyfermot had at least one takeaway within 1km.
- *Sugary drinks flooding the zone:* The popular sugary drinks company Monster apparently has 21 flavours in its range¹⁵ in Ireland, with a staggering 150 different flavours available worldwide. Clever marketing strategies aimed at young people mean that its market share continues to grow, despite the lack of any health benefits to these drinks and distinct health disbenefits to sugary beverages in general. Young people in particular are particularly susceptible to advertising which links consumption with social status, hence the imagery of skateboards, racing cars and gaming to appeal to teenage boys in particular.
- *Cost and convenience:* Unhealthy food is often cheaper and more convenient than nutritious alternatives. This economic reality forces people, especially those with low

¹⁵ <https://www.monsterenergy.com/en-ie/energy-drinks/>



incomes, to prioritise price over health. The "Spinning Plates" report found that the cost of a healthy food basket was substantial, consuming a significant portion of a household's income, especially for single-parent families. A SVP blog documented the story of one woman who participated in a challenge where she fed herself on €5 a day for 5 days, noting how poorly she ate over this period.¹⁶

- *Other pressures:* Because it is easier to cut back on food than other household expenses such as rent or utilities, often people on low incomes cut back on healthy food options to pay other bills.¹⁷ In addition, food prices vary according to whether you live in an urban or rural area. According to research from the Vincentian Partnership for Social Justice the average cost of a healthy food basket for a two parent household with two school aged children living in an urban area is €146 per week, compared to €160 for the same type of household living in a rural area.¹⁸

Overall, our food environment is increasingly shaped by a set of political norms around continuously lowering the cost of food, that have shaped policy, regulation and legislation to incentivise and support ever-increasing production volumes and to further drive down production costs and food prices.

A recent report published by UNEP in conjunction with Chatham House¹⁹ shines a spotlight on “system lock-ins” or institutional and political practices that are not only stifling the shift towards healthy and sustainable diets, but are entrenching current food systems practices and behaviours. The research found that despite increasing political will and overwhelming scientific evidence that show the negative impact that current food systems have on the health of people, animals and the planet, any meaningful change towards food system transformation is proving very difficult to achieve.

Three such lock-ins are identified and analysed, all of which are highly relevant to Ireland. First is the cheaper food paradigm entrenched in current market structures and incentives. Second is the

¹⁶ <https://www.svp.ie/blog/survive-on-five-challenge-becca-gallaghers-diary/>

¹⁷ <https://www.svp.ie/news/one-in-three-calls-to-svp-are-related-to-food-poverty/>

¹⁸ <https://www.justicematters.ie/>

¹⁹ See <https://www.unep.org/resources/report/unlocking-sustainable-transition-agribusiness>



degree of market consolidation and vested interests that characterise the global food system and that sustain business-as-usual practices. Third are the investment path dependencies trapping businesses, farmers, policymakers and citizens in unsustainable, unhealthy patterns of production and consumption. All of these factors need to be studied and addressed in an Irish context.

Recommendations

1. Commission quantitative and qualitative research on the prevalence of food poverty, food insecurity and factors that contribute to the increasingly obesogenic environment and policy lock-ins in an Irish context. Ensure that the voices of marginalised communities especially women are included in the research design to ensure that they can fully participate as equals in food policy research.
2. Ultimately, it is governments that hold the power to write new rules for agribusinesses – rules that prohibit and regulate harmful practices and that set clear and common standards for net-positive production and supply chains. The Government and the HSE should articulate a clear vision for food system transformation including science-based targets for national and global net positive policies that align with the Paris Agreement and associated reductions in greenhouse gases consistent with holding the global temperature increase to 1.5 degrees.

6. Moving Beyond Individual Blame and Stigma

Framing obesity as a failure of individual willpower ignores the powerful external forces that shape diet and health. This approach can be stigmatising and ineffective. Stigma is furthermore a well-documented barrier to seeking help for various health conditions, including overweight and obesity. The "Spinning Plates" report found that shame and embarrassment were significant barriers for residents seeking food support services. Public health scholars argue that effective interventions must move "upstream" to address the root causes of poor health—the social, economic, and political forces that shape people's lives. Focusing solely on lifestyle choices, such as diet and exercise, without changing the environment, is insufficient to reduce health inequities. Instead of placing the burden of responsibility on individuals, the focus of the national obesity strategy should be on those who create and profit from the unhealthy food environment. This



includes the government, the food industry, and retailers. Policy interventions are needed to create supportive environments where the healthy choice is the easy, affordable and sustainable choice. Research strongly indicates a gendered dimension to the issues of weight, food security, and social pressure. This is evident in both data-driven findings and qualitative insights into the emotional and social experiences of women and girls. Obesity carries a stigma, especially in children, and may be linked with bullying. While not exclusively gendered, another study points to "body image and media influences" as top barriers to a healthy lifestyle for teenagers, with girls feeling pressure to be "skinnier" and boys to be "bulkier".

Women, particularly mothers, often bear the primary responsibility for household food management, and the "Spinning Plates" report reveals the emotional and physical toll this takes. Focus groups highlighted that mothers frequently prioritise their children's food needs over their own, and some even go hungry to ensure their children are fed. Food poverty leads to significant emotional burdens. The report cites instances of "young single mothers in particular" experiencing "desperation, unable to cope and suffering with depression" due to financial struggles. Feelings of shame and embarrassment are also major barriers for people, especially women, when trying to access food support services.

The "Talamh Beo" report, while focused on food policy, acknowledges the unacknowledged and unpaid work that women do in the rural economy and in ensuring functioning farms. This points to the broader context of women's labour, which includes managing household food and health, often with limited resources.

Recommendations:

1. The HSE Education Programme offers training and resources to teachers to promote wellbeing in their school. This programme is for primary and post primary level. We recommend that community-led programmes are developed and resourced to allow all members of the community to have similar supports on health and wellbeing, and to address the causes of poor diet, lack of exercise and obesity in line with the Healthy Eating

Active Living Implementation Plan 2023-2027²⁰. We would like to see the plan fully resourced with supports to show the impact of local food sources and healthy eating in line with climate justice principles.

2. The new strategy should fully examine upstream interventions to regulate, tax and label UPFs as appropriate, to deter their use in food processing. Governments can use economic tools to influence consumer and industry behaviour such as taxes on unhealthy foods, subsidies for healthy foods and targeted funding for public health and sustainable food production.
3. The government should consider measures to regulate food producers including marketing and advertising restrictions on unhealthy foods especially to children and young people, bans on ads on public transport, zoning laws to create "no fry zones" that prohibit new fast-food outlets from opening near schools and youth facilities. They can also promote access to supermarkets and fresh food markets in underserved communities. Instead of relying on voluntary industry initiatives, the government can mandate food reformulation to reduce the content of sugar, salt, and saturated fats in a wide range of products, and restricting in-store promotions such as "buy-one-get-one-free" (BOGOF) offers on unhealthy foods and removing them from prominent locations like checkouts and overconsumption.

7. Food and growing as a social movement

Community gardens are more than just places to grow food; they are community assets that address social, environmental, and health challenges in a holistic way. The "Spinning Plates" report highlights that community gardens indirectly address food poverty by providing employment, education, and recreational opportunities for local people. The Cherry Orchard Community Garden, for example, operates as a social enterprise, providing fresh produce to foodbanks, offering free gardening courses, and promoting sustainability.

Organisations like Community Gardens Ireland advocate for specific policy changes to support the growth and sustainability of community gardens. Since the adoption of the Planning and

²⁰ <https://www.hse.ie/eng/about/who/healthwellbeing/our-priority-programmes/heal/>

Development Act 2024, local authorities are now legally obliged to support such initiatives. This is a significant step, as Ireland has historically offered a low level of provision for community growing spaces compared to other European countries. Every local authority should have a data collection system in place to record the number of community gardens and allotments in their functional areas and demand for same, noting that in the past, a large percentage of local authorities did not have a clear policy or waiting list for these spaces. Various forms of support should be offered to communities to establish community gardens and allotments, including financial, educational, and social supports. This involves working with local authorities to increase the number of allotments, providing training courses, and fostering connections between community garden projects and other local initiatives.

Community green spaces foster social cohesion and self-reliance by bringing people from diverse backgrounds together and empowering communities to have greater control over their local environment. This is particularly important for marginalised groups and can help reduce social isolation. Community gardens also provide educational opportunities for all ages, from teaching children how to grow food to offering adult cooking classes and get-togethers that use garden produce. This enhances food literacy and skills for healthier living.

Recommendations:

1. Local authorities should ensure that any community that wants to establish a community garden has the space, expertise and resources to do so. Development plans should make proper provision for allotments and community gardens in all residential areas, and the management of all open areas should be consistent with the All-Ireland Pollinator Plan²¹ to support biodiversity.
2. Implement the recommendations of Community Gardens Ireland²², and Global Action Plan Ireland²³ with a view to ensuring that everyone has access to green space recognising the benefits to people and planet of spending time in nature.

²¹ <https://pollinators.ie/>

²² <https://cgireland.org/community-garden-resources/>

²³ <https://globalactionplan.ie/blogs/green-spaces-are-crucial-for-city-living-but-not-everyone-has-easy-access/>



3. All schools, both primary and secondary, should be resourced and encouraged to establish gardens and healthy food policies.

8. Dietary recommendations for a healthy, sustainable diet for all

The EAT-Lancet Commission's report argues for a global transformation of our food systems to protect both human health and the planet. The report, a collaboration of 37 scientists from 16 countries, proposes a "Planetary Health Diet" that is primarily plant-based, which it presents as a win-win for health and the environment.

The EAT-Lancet report contends that widespread adoption of the Planetary Health Diet could avert approximately 11 million premature deaths per year, representing a reduction of about 20% in annual adult mortality. The diet is rich in plant-based foods and low in animal-derived products, which can lead to significant reductions in non-communicable diseases like cardiovascular disease, type 2 diabetes, obesity, and certain cancers.

The diet's recommendations include a substantial increase in the global consumption of fruits, vegetables, nuts, and legumes, while dramatically reducing the intake of foods like red meat and added sugars. A typical daily intake on this diet consists of approximately 35% of calories from whole grains and tubers, with protein sources being mainly from plants. While the diet is flexible and can include modest amounts of fish, dairy, and meat, it specifically recommends a drastic reduction in red meat consumption—by more than 50% globally—to levels of about 14 grams per day (equivalent to one medium-sized hamburger per week). To date, no Irish health promotion body has adopted this diet and even the EPA has been unwilling to promote diets with less red meat. The report emphasizes that current food production systems are a major driver of climate change, biodiversity loss, and pollution. Agriculture uses 40% of global land, produces 30% of global greenhouse gas (GHG) emissions, and accounts for 70% of freshwater use. The shift to a plant-based diet is identified as the single most impactful action we can take to improve the health of the planet. The production of cattle, for example, is highly resource-intensive, with beef requiring 10 times more GHG emissions and 19 times more land than tofu. Similarly, dairy milk is consistently more environmentally impactful than any plant-based alternative, with GHG emissions being at least three times higher and land use at least 11 times higher.



The EAT-Lancet Commission's recommendations are designed to keep the food system within "planetary boundaries," which are thresholds beyond which Earth's vital systems could become unstable. The global adoption of the Planetary Health Diet could result in a 29% reduction in greenhouse gas emissions, a 21% reduction in fertilizer needs, and a 51% reduction in cropland use. This reduction in land use is particularly crucial for reforestation, a key strategy for mitigating climate change.

The report concludes that a radical transformation of our food system is needed to feed a projected global population of 10 billion people by 2050. This transformation requires a combination of major dietary shifts, a significant reduction in food loss and waste, and substantial improvements in food production practices.

The Climate and Health Alliance's report, "Fixing Food Together," outlines a comprehensive set of recommendations for transitioning Ireland to a healthy and sustainable food system. The report is built on the understanding that diet-related chronic diseases, climate change, and social inequality are interconnected issues driven by the current food system. The recommendations are categorized into six priority action areas, which are further detailed into seven policy and action categories.

Recommendations:

The Fixing Food Together report identifies six challenge areas for Ireland's food system and proposes specific actions to address them.

1. **Ending the junk food cycle:** This involves addressing the pervasive presence and marketing of ultra-processed foods that are high in fat, sugar, and salt (HFSS). The report emphasizes moving beyond the "consumer responsibility" model and using mandatory regulations to create a level playing field for companies to make healthier changes.
2. **Promoting transition to a more plant-based diet:** The report recommends a dietary shift away from excessive consumption of red meat and dairy towards a diet rich in plant-based proteins, fruits, vegetables, and whole grains. The current Irish diet's greenhouse gas (GHG) emissions exceed planetary boundaries by a staggering 226%. Almost half of Ireland's dietary GHG emissions come from animal food products, with red meat being the largest contributor.



7. **Harnessing the power of international and national guidelines:** This area focuses on aligning Ireland's food policies with international commitments like the Paris Agreement and EU strategies. The report calls for integrating environmental sustainability into national food-based dietary guidelines, which are currently lacking. It also advocates for a new, adequately staffed breastfeeding action plan to address Ireland's low breastfeeding rates, which are among the lowest in the world.
8. **Reducing food waste and single-use plastics:** The report highlights that Irish households waste a significant amount of food—about 250,000 tonnes annually, costing €700 per household. Additionally, it points out that single-use plastics account for 70% of the litter in European oceans. Recommendations include banning BOGOF offers on perishable items and increasing access to potable water in public spaces to reduce plastic bottle use.
9. **Improving agricultural practices and land use:** This area addresses the environmental impact of farming, from GHG emissions and water pollution to biodiversity loss. The report advocates for a "just transition" that supports farmers financially and technically to shift to more regenerative and climate-positive farming practices, including horticulture, woodland, and carbon farming.
10. **Using a policy approach to affect behaviour change:** The report stresses that policy and structural changes are more effective than relying on individual willpower for large-scale change. It calls for educational and mass media campaigns to communicate the "triple win" of a sustainable diet for people, their wallets, and the planet.

The Fixing Food Together makes a further set of detailed recommendations as follows:

- **National Guidelines:** Update national dietary guidelines to include environmental sustainability as a core parameter. Fully implement a new breastfeeding action plan and ensure compliance with the WHO code on marketing breastmilk substitutes. Broaden the scope of future climate and agricultural policies to include nutrition and food security.
- **Regulations and Laws:** Publish a Public Health (Obesity) Bill with provisions for online and television advertising bans on unhealthy foods. Introduce legislation to make the removal of HFSS foods from checkouts and end-of-aisle displays mandatory. Implement "no fry zones"



near schools and use zoning laws to promote healthy food outlets in underserved communities.

- **Research and Technology Actions:** Adequately fund independent surveillance systems to monitor dietary patterns and the sustainability of farming practices over time. Commission research to establish effective food labelling systems and to identify strategies for promoting fruit and vegetable consumption in low-income groups.
- **Financial Actions:** Expand the existing sugar-sweetened drinks tax to include a wider range of ultra-processed foods, using the revenue to subsidize healthy, sustainable foods. Use financial incentives and planning regulations to support the establishment of new supermarkets and markets in underserved communities.
- **Agricultural Actions:** Provide governmental subsidies and credit to farmers who transition from livestock farming to horticulture, woodland, or other regenerative practices. Ambitiously incentivize organic farming and invest in programs that support farmers in growing and marketing nutritious foods.
- **Public Institution Actions:** Integrate sustainability criteria into food procurement for public institutions like schools and the HSE. Ensure adequate funding for school meal programs and implement a mandatory Healthy Food Policy for all schools.
- **Education and Public Awareness Actions:** Launch mass media campaigns that promote healthy and sustainable diets. Update the training curricula for healthcare professionals, farmers, and teachers to include planetary health and sustainable food systems. Scale up effective community programs with a focus on disadvantaged areas.

9. Make Breastfeeding to WHO Guidelines a National Health Priority

Breastfeeding is widely recognized as a significant protective factor against childhood obesity. The World Health Organization (WHO) and other public health bodies recommend exclusive breastfeeding for the first six months of a baby's life, with continued breastfeeding alongside complementary foods for up to two years or beyond.

Scientific studies consistently show an association between breastfeeding and a lower risk of obesity in children. A WHO study of nearly 30,000 children across Europe found that those who



were exclusively breastfed for six months were 25% less likely to be obese than children who were never breastfed. A systematic review and meta-analysis of studies in developed countries also found that breastfeeding decreased the odds of a child becoming overweight or obese by 13%. Irish research has shown that infants breastfed for six months or more were 51% less likely to be obese. This protective effect is often attributed to several factors. Exclusive breastfeeding can delay the introduction of solid foods, which may be high in calories. Furthermore, some evidence suggests that breastfed babies may have lower insulin levels than formula-fed babies, which can reduce fat deposition. A key behavioural factor is that breastfed babies are thought to be better at self-regulating their milk intake, which may help them develop a healthy response to satiety cues later in life.

Recommendations:

1. **Funding and Implementation:** The NWCI has called on the government to fully fund and implement the expired "Breastfeeding in a Healthy Ireland Action Plan"²⁴ and update this plan as soon as possible. The FCCJ project supports the call for investment in training and skills development for healthcare staff and for the creation of additional lactation specialist positions to provide expert support to mothers.
2. **Legislation and Regulation:** They urge the government to strengthen legislation to protect women and infants from the "predatory marketing tactics" of the baby food industry. This includes full implementation of the World Health Organization (WHO) Code of Marketing of Breastmilk Substitutes in Irish and EU law, with a particular focus on regulating digital marketing and the misleading promotion of "follow-on" or "toddler" milks.
3. **Broader Support for Mothers:** supporting breastfeeding requires addressing wider gender inequalities. The NWCI recommends better workplace support and investment in public childcare to enable women to continue breastfeeding for as long as they choose.

²⁴ <https://www.hse.ie/eng/about/who/healthwellbeing/our-priority-programmes/child-health-and-wellbeing/breastfeeding-healthy-childhood-programme/research-and-reports-breastfeeding/breastfeeding-in-a-healthy-ireland.html>