



**Community Gardens Ireland**  
Submission on Draft CFS  
Policy on Urban and Peri-  
Urban Food Systems



**13<sup>th</sup> March 2025**



## Submission on Draft CFS Policy on Urban and Peri-Urban Food Systems

Community Gardens Ireland

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## Community Gardens Ireland

Community Gardens Ireland is a network of community gardens and allotments on the island of Ireland. In existence since 2011, it aims to support and promote community gardening in Ireland and Northern Ireland. Community Gardens Ireland is a voluntary group with a committee membership from all corners of Ireland.

Community Gardens Ireland contributes positively to consultations regularly at a national and international level. Our submissions and presentations in 2021, 2022, 2023 and 2024 include the following:

- Presentations to the Joint Oireachtas Committees on Housing, Local Government and Heritage and Social Protection, Community and Rural Development and the Islands
- Food Waste Consultation
- Sustainable Development Goals Implementation Plan
- Climate Action Plan, 2021 and 2023(Ireland)
- Citizens' Assembly on Biodiversity Loss and Ireland's 4<sup>th</sup> Biodiversity Action Plan
- Climate Change Bill, 2021 consultation (Northern Ireland)
- Community Foundation Fund, in partnership with Social Farms and Gardens Northern Ireland (grant application)
- Public Consultation on the environmental assessment of the Draft CAP Strategic Plan 2023-2027
- Planning and Development Bill 2023-2024

Our committee for 2024/25 includes the following volunteers:

- Maeve Foreman – Mud Island Community Garden, North East Inner City (NEIC), Dublin 3
- Claire Lyons – Cherry Orchard Community Garden, Dublin 10
- Dónal McCormack – Blessington Allotments, Wicklow (co-Chairperson & Policy Officer)
- Conor O’Kane – Social Farms and Gardens Northern Ireland
- Órlaigh Sally – Co. Tyrone therapeutic horticulture teacher and Community Gardener (Treasurer)
- Miren Samper – Bloomin Crumlin Allotment / Community Garden
- Justyna Traore – Top of the City Community Garden, Waterford
- Maria Young– Green Spaces for Health, Cork
- Dympna McNamee - Community Gardener, Tyrone
- Adrian O’Connor – Community Gardener, Tipperary
- Jenny Lyons – Urban Agriculture Researcher, MA Gastronomy and Food Studies, TU Dublin (Secretary)
- Ray Harte – Men’s Sheds Portlaoise Community Garden & Graham-Haslam-Whelan Community Garden
- Molly Garvey – Co. Cork and Community Gardener (co-Chairperson)
- Dee Sewell – Environmental Awareness Officer at Carlow County Council





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### Executive Summary

Community Gardens Ireland is a network of community gardens and allotments on the island of Ireland. In existence since 2011 it aims to support and promote community gardens in Ireland and Northern Ireland.

Internationally, the evidence-based benefits of community gardens are many, from the proven physical, mental health and well-being benefits to educational, environmental, biodiversity and cultural gains. There is also evidence that they hugely increase social capital by encouraging active citizenship and social connection, help reduce health inequalities, and contribute to reducing anti-social behaviour, thus making communities safer.

Despite the proven benefits, there is no country-wide policy in place in Ireland to increase the number of allotments and community gardens. The existing legislation also provides little protection for communities or duties on local authorities.

In urban areas the amount of land available for allotments and community gardens will become increasingly scarce. Community Gardens Ireland's survey of its members in 2021 highlighted that the majority of community gardens surveyed had temporary licences which can have large implications for funding purposes, some were on temporary sites zoned for housing and many struggled to obtain funding for garden infrastructure.

Compared to other countries, Ireland lags behind in the provision, support and protection of allotments & community gardens. Ireland currently provides one of the fewest number of allotments & community gardens in the EU.

Internationally there is strong support for urban agriculture initiatives such as community gardens or allotments to help biodiversity and as a positive climate change action. The Intergovernmental Panel on Climate Change has referenced that *"urban and peri-urban agriculture can contribute to improving urban food security, reducing GHG emissions, and adapting to climate change impacts."*

This submission therefore calls on the Draft CFS Policy to include our recommendations as follows:

- **Regular Reporting and Metrics**
- **Growing Education**
- **Access to seeds and seed saving**
- **School Gardens**
- **Children's rights and the environment with a special focus on climate change**
- **Maintaining fair access to space to grow food**



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## Recommendations

### Regular Reporting and Metrics

Identifying the current number of urban agriculture initiatives within countries presents several challenges. There can be complications when comparing available figures between countries due to potential differences in the way data is collected and reported.

In Ireland's case, the method for determining the number of urban agriculture initiatives has varied across the last 100 years. Consistency in measurement is important to ensure that improved reporting can be carried out by governments, which will improve the ability to assess how well the Draft CFS Policy is being implemented by governments.

Community Gardens Ireland recommend to include the regular recording by governments on the number of initiatives that support urban and per-urban food systems. For example, implementation of a 5 yearly urban agriculture census to be carried out by local government authorities which would then be published by the national government. This would assess the current progress of the implementation of urban agriculture initiatives and enable cross comparison between countries.

### Growing Education

The act of knowing how to grow food is one of the most crucial skills we can learn. This knowledge becomes more important to maintain as our world becomes more urbanised. It's important to maintain a connection with those in urban and peri-urban areas to food.

Community Gardens Ireland believe there is a role for governments, including subnational and local government authorities to development plans, encourage, promote and strengthen food education programmes to ensure that communities retain and share access to knowledge about food growing, seed saving, soil stewardship, crop rotation, seed propagation, spacing of vegetables, supporting of biodiversity etc.

These food education programmes should be accessible for all age groups. Support should be given to help with knowledge transfer for cross-generational groups.

### Access to seeds and seed saving

Seeds are the start of all life on earth. The simple act of saving seed is something that should be included in the Draft CFS Policy.

Community Gardens Ireland believe it is important to ensure equitable access to communities to grow their own food that countries have policies to encourage and protect access to open-pollinated seeds.



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### School Gardens

As our world becomes more urbanised and climate change becomes more pronounced, it is important to maintain regular access to green spaces for communities. For example, the WHO (World Health Organisation) included reference to allotments & community gardens in their publication "Urban green spaces: a brief for action". In addition, they recommend the following:

*"As a rule of thumb, urban residents should be able to access public green spaces of at least 0.5–1 hectare within 300 metres' linear distance (around 5 minutes' walk) of their homes."*

Ref: <https://apps.who.int/iris/bitstream/handle/10665/344116/9789289052498-eng.pdf>

Along with keeping access to green spaces for residents, it is important that school children connect with the process of how to grow food. School gardens are a useful method for encouraging knowledge transfer to school children.

Community Gardens Ireland emphasises the importance of recognising the role that educational institutions play in transmitting food growing knowledge to the next generation.

### Children's rights and the environment with a special focus on climate change

Community Gardens Ireland supports General Comment No. 26 on Children's rights and the environment with a special focus on climate change.

Specifically, we believe that the right to a clean, healthy and sustainable environment is important and should be considered in the Draft CFS Policy. This is particularly evident in the context of providing spaces for communities to grow food without chemicals and without GMO, while also creating a healthier environment to protect children and our pollinators.

### Maintaining fair access to space to grow food

Community Gardens Ireland believes that there is a role on governments to provide space to those who wish to grow their own food. This should be provided at an accessible cost (ideally at a reduced rate) to ensure that the cost of renting land remains open to all.

Community Gardens Ireland also believes that long term planning should be considered when it comes to land allocation plans. Space for communities to grow their own food should be considered in planning and development objectives, laws, and strategies for governments. It should also be the policy of governments to maintain and expand the space available for growing food locally, particularly given the forecasted increase in the number of people due to live in urban areas in the coming years. This would enable communities in urban and peri-urban areas to ensure a connection with the food that they eat.



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### Appendix 1 Community Growing Spaces & SDGs

Community Gardens Ireland have been leading the conversation nationally on the need for more allotments and community gardens. In recent years, we have seen the number of community gardens associated with our organisation double from 100 to 200, yet the total number provided in Ireland is still far below the levels for most other EU countries.

We have seen more local authorities, communities and individuals acknowledge the benefits that come from growing your own food locally as a community, and how it helps build life-long friendships within communities.

More work is required at all levels to deliver more of these essential community spaces.

To advance this, Community Gardens Ireland contribute positively to consultations regularly at a national level. Since 2021, Community Gardens Ireland as a voluntary organisation have made almost 100 submissions with our submissions regularly referencing allotments and community gardens and the need for more support, protection and an increased number of these spaces provided.

In 2024, Community Gardens Ireland released a paper detailing how community gardens and allotments help with the following Sustainable Development Goals:

- SDG Number 1: No Poverty
- SDG Number 2: Zero Hunger
- SDG Number 3: Good Health and Well-Being
- SDG Number 4: Quality Education
- SDG Number 6: Clean Water & Sanitation
- SDG Number 10: Reduced Inequalities
- SDG Number 11: Sustainable Cities and Communities
- SDG Number 12: Responsible Consumption and Production
- SDG Number 13: Climate Action
- SDG Number 15: Life on Land





## **Appendix 2 Climate Change and Biodiversity Actions**

### **Reductions in carbon and GHG emissions from community gardening**

In the past, organisations such as the Scottish Allotments and Gardens Society have estimated the potential reduction in CO<sub>2</sub> emissions from community growing spaces. According to their document “Briefing paper on Allotments, Food and Climate Change: how growing one's own food can reduce emissions from food production”:

*“If we assume that 25% of a plot-holders food is grown on their plots and there is a commensurate reduction in all bought food (but not in the domestic processing) then 4% (0.5 tonnes) of an individual’s total emissions will be saved each year. Surveys show that crops are usually shared by families, friends and local community groups. If we use a conservative estimate of two people benefiting, then at least 1 tonne of CO<sub>2</sub> is saved by each standard allotment plot every year and a one hectare allotment site saves 50 tonnes of CO<sub>2</sub> per annum.”*

The Scottish Government also highlighted the reduction in carbon emissions from community growing, with estimates of between 2kg and 5kg of carbon equivalent for every kilogram of vegetable produced:

*“Carbon emissions (including reducing energy use, more sustainable transport and less waste) can be reduced by between 2kg and 5kg of carbon equivalent for every kilogram of vegetable produced”*

Ref: <https://www.gov.scot/binaries/content/documents/govscot/publications/consultation-paper/2018/06/allotments-further-guidance-local-authorities-part-9-community-empowerment-scotland/documents/00537266-pdf/00537266-pdf/govscot%3Adocument/00537266.pdf>

### **Intergovernmental Panel on Climate Change (IPCC) Report, 2019**

A large argument in favour for the provision of more community growing spaces is that the spaces assist in the reducing of greenhouse gas emissions, improving urban food security, improving biodiversity and adapting to climate change impacts. In 2019, the IPCC released a report which included Urban Agriculture initiatives, as follows:

*“Urban and peri-urban agriculture reduces the food carbon footprint by avoiding long distance food transport. These types of agriculture also limit GHG emissions by recycling organic waste and wastewater that would otherwise release methane from landfills and dumping sites (Lwasa et al. 2014). Urban and peri-urban agriculture also contribute in adapting to climate change, including extreme events, by reducing the urban heat island effect, increasing water infiltration and slowing down run-offs to prevent flooding, etc.*

*(Lwasa et al. 2014, 2015; Kumar et al. 2017a1209). For example, a scenario analysis shows that urban gardens reduce the surface temperature up to 10°C in comparison to the temperature without*



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vegetation (Tsilini et al. 20151210). Urban agriculture can also improve biodiversity and strengthen associated ecosystem services (Lin et al. 20151211).”

“In summary, urban and peri-urban agriculture can contribute to improving urban food security, reducing GHG emissions, and adapting to climate change impacts (robust evidence, medium agreement).”

Ref: <https://www.ipcc.ch/srccl/chapter/chapter-5/>

### **Intergovernmental Panel on Climate Change (IPCC) Report – Working Group III, March 2022**

Following the 2019 report above, the IPCC released their Working Group III report in March 2022. Detailed within this were climate and biodiversity actions related to increasing the amount of urban agriculture in urban areas, as detailed below:

**D.2.1 Sustainable urban planning and infrastructure design including green roofs and facades, networks of parks and open spaces, management of urban forests and wetlands, urban agriculture, and water-sensitive design can deliver both mitigation and adaptation benefits in settlements (medium confidence). These options can also reduce flood risks, pressure on urban sewer systems, urban heat island effects, and can deliver health benefits from reduced air pollution (high confidence).**

**8.1 Sustainable Development:** Urban agriculture, including urban orchards, roof-top gardens, and vertical farming contribute to enhancing food security and fostering healthier diets.

**8.2.2 Economic development, competitiveness, and equity:** Urban agriculture can not only reduce household food expenditure, but also provide additional sources of revenue for the city.

**8.4.6 Urban-rural linkages:** Urban food systems, as well as city-regional production and distribution of food, factors into supply chains. Reducing food demand from urban hinterlands can have a positive impact on energy and water demand for food production (Eigenbrod and Gruda 2015) (see ‘food system’ in Glossary). Managing food waste in urban areas through recycling or reduction of food waste at source of consumption would require behavioural change (Gu et al., 2019). Urban governments could also support shifts towards more climate-friendly diets, including through procurement policies. These strategies have created economic opportunities or have enhanced food security while reducing the emissions that are associated with waste and the transportation of food. Strategies for managing food demand in urban areas would depend on the integration of food systems in urban planning.

Link: [https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC\\_AR6\\_WGIII\\_FullReport.pdf](https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_FullReport.pdf)





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### World Health Organisation recommendations for public green spaces

The World Health Organisation included reference to allotments and community gardens in their publication "Urban green spaces: a brief for action". In addition, they recommend the following:

*"As a rule of thumb, urban residents should be able to access public green spaces of at least 0.5–1 hectare within 300 metres' linear distance (around 5 minutes' walk) of their homes."*

<https://apps.who.int/iris/bitstream/handle/10665/344116/9789289052498-eng.pdf?sequence=1&isAllowed=y>

### Citizen's Assembly on Biodiversity Loss

In March 2023, the Citizen's Assembly on Biodiversity Loss issued their final report to the government. Community Gardens Ireland made a detailed submission to the citizen's assembly during the consultation period in 2022.

The final report of the Citizen's Assembly on Biodiversity Loss recommended the following:

*51. The State must ensure the expansion of community gardens and allotments through local authority initiatives in conjunction with private landowners, in both urban and rural communities.*

Link: [https://citizensassembly.ie/wp-content/uploads/Report-on-Biodiversity-Loss\\_mid-res.pdf](https://citizensassembly.ie/wp-content/uploads/Report-on-Biodiversity-Loss_mid-res.pdf)

In April 2023, the Children and Young People's Assembly on Biodiversity Loss recommended the following:

*28 Encourage people to grow more vegetables for themselves  
35 Make more green spaces in cities and urban areas*

Link: <https://cyp-biodiversity.ie/>



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### Appendix 3 Supporting documentation for biodiversity and climate benefits from allotments and community gardens

Source	Details	Link
<b>Association for Public Service Excellence</b>	Biodiversity and Allotments: Gardening in harmony with Nature	<a href="https://www.apse.org.uk/apse/index.cfm/news/articles/20/biodiversity-and-allotments-gardening-in-harmony-with-nature/">https://www.apse.org.uk/apse/index.cfm/news/articles/20/biodiversity-and-allotments-gardening-in-harmony-with-nature/</a>
<b>IOPScience</b>	Environmental Research Letter:  Potential of urban green spaces for supporting horticultural production: a national scale analysis	<a href="https://iopscience.iop.org/article/10.1088/1748-9326/ac4730">https://iopscience.iop.org/article/10.1088/1748-9326/ac4730</a>
<b>Scottish Allotments and Gardens Society</b>  <b>Scottish Natural Heritage</b>	Allotments and Biodiversity Gardening in harmony with nature	<a href="https://www.glasgow.gov.uk/CHttpHandler.ashx?id=31684&amp;p=0">https://www.glasgow.gov.uk/CHttpHandler.ashx?id=31684&amp;p=0</a>
<b>Glasgow City Council</b>		
<b>South Dublin Allotments Association as part of its contribution to 2010 - United Nations International Year of Biodiversity</b>	Biodiversity and Allotments	<a href="http://homepage.eircom.net/~sthduballots/Biod2010.pdf">http://homepage.eircom.net/~sthduballots/Biod2010.pdf</a>
<b>French allotment federation (FNJFC)</b>	Allotment gardens, a real biological diversity	<a href="http://www.jardins-familiaux.org/pdf/news/fr/FR210810_E_Frankreich44.pdf">http://www.jardins-familiaux.org/pdf/news/fr/FR210810_E_Frankreich44.pdf</a>
<b>The Highway Council</b>	Growing Our Future - A Community Food Growing Strategy for Highland	<a href="https://www.highland.gov.uk/download/downloads/id/22921/growing_our_future_-_a_food_strategy_for_highland.pdf">https://www.highland.gov.uk/download/downloads/id/22921/growing_our_future_-_a_food_strategy_for_highland.pdf</a>



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### Appendix 4 Country/EU Specific Supporting Documentation

Source	Details	Link
<b>Community Gardens Ireland's Lets Get Growing Report, March 2022</b>	Link to report presented at Oireachtas Committee, 1 <sup>st</sup> March 2022	<a href="https://cgireland.org/wp-content/uploads/2022/02/Community-Gardens-Ireland_Lets-Get-Growing.pdf">https://cgireland.org/wp-content/uploads/2022/02/Community-Gardens-Ireland_Lets-Get-Growing.pdf</a>
<b>Scottish Government</b>	Link to guidance documents and laws around community growing in Scotland	<a href="https://www.gov.scot/publications/part-9-community-empowerment-scotland-act-2015-allotments-guidance-local-authorities/pages/2/">https://www.gov.scot/publications/part-9-community-empowerment-scotland-act-2015-allotments-guidance-local-authorities/pages/2/</a>
<b>Welsh Government</b>	Link to guidance documents and laws around community growing in Wales	<a href="https://www.gov.wales/allotments-and-community-gardens">https://www.gov.wales/allotments-and-community-gardens</a>
<b>European Commission Parliamentary Question</b>	Acknowledgement by European Commission of the role of community gardens and allotments in helping pollinators and wider biodiversity, as well as to quality of life, learning and social interaction	<a href="https://www.europarl.europa.eu/doceo/document/E-9-2019-003594-ASW_EN.html">https://www.europarl.europa.eu/doceo/document/E-9-2019-003594-ASW_EN.html</a>
<b>European Commission Parliamentary Question</b>	Details from the European Commission on the role of urban agriculture as a part of Europe's food production landscape with potential for further growth and development.  Also details about the EU Biodiversity Strategy for 2030, which the Commission called on European cities of at least 20 000 inhabitants to develop ambitious Urban Greening Plans by 2021.	<a href="https://www.europarl.europa.eu/doceo/document/E-9-2022-001084-ASW_EN.html">https://www.europarl.europa.eu/doceo/document/E-9-2022-001084-ASW_EN.html</a>



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