



# Environmental Pillar

WORKING FOR A SUSTAINABLE FUTURE

## Introduction:

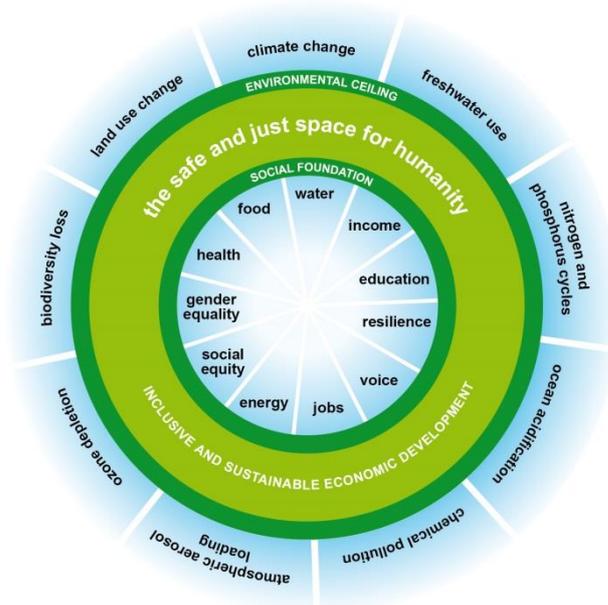
The Draft National Risk Assessment has an explicit goal of ensuring that Ireland's terrible reversal of fortune never recurs. In this context the Environmental Pillar would like to highlight the gaps in the Risk assessment in terms of Biodiversity, Health, Agriculture, Forestry and the Greening on the Economy.

We are cognisant that this is an attempt to identify strategic risks and that further more detailed work needs to be carried in assessing best practice to deal with the threats. The Environmental Pillar would strongly express a desire to input in to the ongoing processes and to offer its unique perspective and expertise in managing the threats.

## Overarching strategy to avoid risks

We welcome the diagram *Figure 1* on page 5 showing the clear links between the many risks facing Ireland. However we would suggest that the report should reflect more accurately the reality of the situation as shown in the diagram below which illustrates the following reality:

The continuing success of Irish society depends fundamentally on the preservation of the overall productivity, health and long term sustainability of the eco-systems and environmental services that underpin and supply many of the most basic components of human welfare - such as healthy soils, flourishing biodiversity, clean water and clean air.



## **Biodiversity:**

Ireland's biodiversity is facing critical threats. A diversity of plants and animals is essential to a stable environment and the many services that that environment provides to the Irish society and economy. This has been quantified in declining numbers of bird, bat and fish populations to name but a few.

This decline represents a threat in particular to our tourism industry which depends on our natural capital. The recent successful launch of the Wild Atlantic Way, built on our natural environmental assets, highlights this. Habitat loss linked to unsustainable land management practices and driven in large part by the changes to CAP payments is a direct threat to biodiversity, and so to our society and economy.

The interconnected nature of biodiversity and the challenges of addressing the risks in a cross departmental approach is highlighted by declining bat species. Loss of habitat is leading to a loss of our bat populations. Bats, through consuming up to 3,000 insects per night, are a first line of defence against diseases spread by flying insects. Failing to address the loss of bats represents an indirect threat, through lack of natural control on insects, of Blue Tongue in cattle.

Similarly, a loss of hedgerows and scrub will lead to a reduction in the numbers of natural predators of vermin, leading to an increase in rats and mice.

Our pollinators are under threat with many farmers and horticulturalists having to keep beehives on their land to ensure that enough pollination of crops will occur.

Biodiversity equals resilience, and we must identify and manage all threats to biodiversity in order to ensure a resilient future for the country.

## **Agriculture:**

Growth in the Agriculture industry has been identified by the Government as one of the foundations of our recovery. And it is critical that clear government-lead policy drives the agriculture sector so as to maintain ownership and control over it. Without this there is a risk of replacing the property bubble with an agriculture bubble.

Today this growth is driven by the implementation of Food Harvest 2020 (FH2020). FH2020 is described as an industry initiative despite the fact that the Minister for Agriculture chairs its High Level Implementation Committee. With c.70% of the land area of the country subject to the potential impacts of agricultural activities, the agricultural sector needs to be directed by a Government-led plan, and there needs to be clarity about this, with a full environmental impact assessment being conducted on same. In this context, the scientific basis for the Environmental Analysis Report of FH2020 has been questioned.

On Harvest 20/20, the emphasis on increased beef and dairy production is totally misplaced, in light of stronger emission controls that will become obligatory on Ireland in the future. As the international response to climate change becomes tougher, Ireland will be found in breach of emission controls and will be forced to pay fines or reduce emissions. This will obviate any gains made from increased production.

The connection between previous Irish 'agricultural booms' and unsustainable farmer debt is a lesson that needs to be learnt. The level of debt, on Irish farms and in Co-op's, needs to be seriously considered. The links between debt on farms and the dependency banks as lenders have on receipt of European payments (under CAP) by the farmers in order to be able to meet their loan repayments should be explored. The banking sector should not be allowed to be an influential voice in determining sustainable agriculture policy. The banking sector is not a stakeholder that considers sustainability from the three linked perspectives of environment, social and economic but rather purely from the economic viewpoint.

### **Forestry**

Ireland's forestry policy is outdated. Monocultures dependent on chemical applications designed for clear-fell is not a sustainable model. There are risks in terms of susceptibility to disease, which we have already seen with *Chalara fraxinus* and *Phytophthora ramorum*. A robust forest of mixed species of native provenance stock that allows for selective felling of different aged trees can provide a solution to the threat, but this is absent from forestry policy. Same age, same height, shallow rooted forests are more vulnerable to storm damage as was highlighted by the loss of more hectares of forests in one week than were planted in the previous year.

The lack of an updated contemporary forest policy is a threat to whole industry including jobs in nurseries and amongst forest contractors. Notwithstanding the threat to our Climate Change sequestration commitments if disease or storms were to significantly reduce our tree-cover.

### **Tourism**

Ensuring that environmental issues receive equal consideration in risk assessments with the other aspects of sustainability, namely economic and social, is critical to ensuring the protection and enhancement of our natural capital on which our tourism industry is so dependent.

– In the Failte Ireland 2010 visitor attitudes survey, tourists were asked why they came to Ireland. 84% said they came here for the natural unspoilt environment, with 91% coming here to enjoy the beautiful scenery. The quality of the environment was the second most important factor in choosing Ireland as a holiday destination.

[http://www.failteireland.ie/Failtelreland/media/WebsiteStructure/Documents/3\\_Research\\_Insights/3\\_General\\_SurveysReports/2010\\_Main\\_Markets.pdf?ext=.pdf](http://www.failteireland.ie/Failtelreland/media/WebsiteStructure/Documents/3_Research_Insights/3_General_SurveysReports/2010_Main_Markets.pdf?ext=.pdf)

## **Health**

The cost in terms of harm done to the health and well-being of the people of Ireland and as a consequence to the Irish economy by environmental degradation is large, though difficult to put a figure on. The impacts of climate change are likely to increase these impacts.

History shows us that action by government can have significant impacts in reversing this trend. For example, every year the lives of 357 people are saved in Dublin through the ban on smokey coal, and the subsequent improvement in air quality. Clean air reduced the number of deaths from heart attacks by 15% and deaths from respiratory illness by 10%.<sup>1</sup>

The benefit of the smoky coal ban in monetary terms was €20 million euro.<sup>2</sup>

## **Greening the Economy**

Greening the Irish economy needs to appear at the heart of all economic decision and threat identification. Greening is about making the economy viable in all senses of the word. An aspiration to greening should be restricted to a subsection of the Action Plan for Jobs but rather used as a tool to reduce risk, identify threats and ensure that the growth out of the crisis is not based exclusively on economic models and the traditional GDP measurements.

Ireland's dependence on the current level of Foreign Direct Investment (FDI) is not sustainable. It is inevitable that changes will be forced on the very favourable tax regime that is enjoyed by foreign multinational companies, exporting from Ireland. Import substitution must become part of any sustainable job creation policy, and this should be based on the development of a circular economy.

## **Specific text amendments to the text of the Draft National Risk Assessment:**

Page 8 Environmental Risks

(i) Climate Change & adverse weather events

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<sup>1</sup> (The Lancet, [Volume 360, Issue 9341](#), Pages 1210 - 1214, **Effect of air-pollution control on death rates in Dublin, Ireland: an intervention study**. Prof [Luke Clancy](#) MD a, [Pat Goodman](#) PhD b, [Hamish Sinclair](#) PhD c, Prof [Douglas W Dockery](#))

<sup>2</sup> <http://www.environ.ie/en/Publications/Environment/Atmosphere/FileDownload,29914,en.pdf>

PARA 3. SEE PROPOSED CHANGES IN ITALICS. Notwithstanding these uncertainties, it is clear that Ireland *is experiencing impacts* and will continue to experience impacts.

*The key challenge is how to ensure a sustainable energy supply without contributing to climate change.*

(iii) Food safety.

*The key challenge is to prevent biodiversity loss while ensuring food security.*

*A major risk in Ireland in our present mode of economic development is that we undervalue our ecosystems and ecosystem services leading to degradation of our natural resources. This has and will continue to have an effect on our food safety and human health and well-being, our economy, and all aspects of life in Ireland.*

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*Environmental Pillar members:* An Taisce. Bat Conservation Ireland, BirdWatch Ireland. CELT - Centre for Ecological Living and Training. Coast Watch. Coomhola Salmon Trust. Crann. ECO UNESCO. Feasta. Forest Friends. Friends of the Earth. Global Action Plan Ireland, Gluaiseacht. Hedge Laying Association of Ireland. Irish Doctors Environment Association. Irish Natural Forestry Foundation. Irish Peatland Conservation Council. Irish Seal Sanctuary. Irish Seed Saver Association. Irish Whale and Dolphin Group. Irish Wildlife Trust. The Native Woodland Trust. The Organic Centre. Sonairte. Sustainable Ireland Cooperative. VOICE. Zero Waste Alliance Ireland