Environmental Pillar
WORKING FOR A SUSTAINABLE FUTURE

Submission of the Environmental Pillar on the Draft Environmental Analysis Report of Food Wise 2025

August 2015

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1. Introduction

The Environmental Pillar welcomes the opportunity to input into this process. We were disappointed to see the FoodWise2025 strategy "launched" by such senior figures as Minister Coveney and the Taoiseach when the public consultation phase had yet to take place.

We would note that FW2025 is an extension of the FoodHarvest2020 strategy. We welcome that the government and DAFM are taking full ownership of FW2025 and accept that it is bound by both the SEA and the Habitats Directives. This did not happen for FH2020.

The strategy needs to ensure that the exposure to risks that are external to our national control are minimised. Growth figures and ambitions based upon presumed rates of growth in the Chinese economy of 7% for example appear to be overly optimistic.

At the time of writing economists are describing today, Monday 24/8/15, as the Chinese economie's "Black Monday". Two weeks ago the Chinese central bank had to devalue the national currency.

A recent analysis of the impact of the Trans-Atlantic Trade and Investment Partnership suggested a contraction of the beef sector in Ireland and a consequential loss of jobs in the sector. FoodWise2025 should be informing Irelands negotiating position on international trade agreements such as this, and contradictions between government departments should be reconciled.

The unsubstantiated use of the term "sustainable intensification" needs to be addressed.

These factors increase the risks of the agri-food sector being forcibly hyped and inflated to create an agri bubble to replace the property bubble in an attempt to manufacture an economic recovery.

Environmental issues are critical to all citizens and industries, but none more so that to the agri-food sector. The very basis on which the agri sector exists is a robust productive and resilient environment. It is not sufficient to give lip service to the environmental concerns of NGOs as represented by the Environmental Pillar.

2. Background to scoping decisions

It is difficult to engage in the detailed arguments about the SEA and AA when its overall context and scope is so flawed. Although there are strong claims of sustainability these are not backed up by robust analysis or scenario testing. The make-up of the committee that drafted FoodWise2025 was hand-picked by DAFM and does not reflect a balance between the three stakeholder groups that represent sustainability. There was only one seat for an environmental NGO, and the only other truly environmental seat was held by the EPA. The Environmental Pillar, despite strong engagement with FH2020 and the Environmental Analysis Report associated with that strategy, was not offered a seat on the committee.

Annex III of the Environmental Analysis Report lists, amongst others the environmental groups that were invited to provide observations on the scoping phase of the process.

This workshop resulted in the production of an "issues paper" compiled by Dr. Ainhoa Gonzalez and Dr. John Fry. At some point the paper authors left the consultation team and their expertise and inputs were lost.

https://www.agriculture.gov.ie/media/migration/agri-foodindustry/2025agri-foodstategy/environmentalreportafs2025/SEAIssuesPaper170415.pdf

Why did this happen and at what stage?

How did the issues raised in the issues paper affect the final decisions on the scope of the Report?

Which issues are dealt with and which are not addressed, and what was the process and reasoning behind inclusion or omission?

3. Scope

Sustainability **(from page 12 of the Draft Environmental Analysis report)**
From the outset the strategy was prepared in the knowledge that:
-Ireland's agri-food sector through its farmers, fishermen and forestry owners manages the vast majority of the natural resources in Ireland;
-Ireland faces significant challenges in meeting some national and international environmental targets for air quality, biodiversity and water quality;
-Meeting Greenhouse Gas (GHG) and ammonia emission reduction targets will be particularly challenging; and
-The continued growth of the agri-food sector must be based on sustainable intensification, a concept included in the conclusions of the October 2014 EU Council on the 2030 EU Climate and Energy Policy Framework.

Despite setting out the above scenario including the "significant challenges" faced by Ireland in meeting basic international environmental targets, there is no examination of the actual impact on the water, soil or biodiversity of increased numbers of animals or increased intensification.

A high technology scenario (combined with market forces) of achieving the growth is presumed without any specific policies or mechanisms in place to either implement or fund this.

The single biggest failing of the draft report is the limitations of its scope.

This viewpoint is elaborated on in Professor Alan Matthews', (Department of Economics TCD, European Agricultural Policy) analysis.

From Alan Matthews' blog on SEA of FW2025:-

"*This ambiguous nature of FW2025 does not make it easy to perform a Strategic Environmental Assessment (SEA). On the one hand, the strategy has been defined with the expectation of substantial growth in output, both at primary production and processing levels. On the other hand, the report itself is more about positioning the food industry to take advantage of this growth by focusing on high added value products, emphasising its environmental and sustainability credentials. So what should be the focus of the Strategic Environmental Assessment – on the environmental implications of the underlying growth, or on the measures proposed in the report to underpin and make more credible the industry's claim to environmental sustainability?*

The published draft Environmental Report comes down firmly on the side of the second alternative."

"Its approach is to take each of the individual recommendations, or 'actions', grouped into categories and then to assess the potential impact of each group of actions on 17 Strategic Environmental Objectives in the form of a matrix.

As an example, the actions related to the dairy sector are divided into 6 categories and sub-categories which, mapped against the 17 Strategic Environmental Objectives, gives a matrix with 102 potential environmental impacts. Of these, only 5 are judged to be slightly negative, all related to actions grouped in the category 'grassland and soil management'. Some potentially negative consequences are foreseen for water quality, habitats and species, as well as higher GHG emissions because increasing soil fertility is likely to involve increased use of fertilisers.

The fact that dairy cow numbers might expand by up to 30% (which is suggested as a possible outcome under the high expansion strategy) is not deemed relevant to the SEA and is therefore not assessed. The expected negative increase of GHG emissions is put down to increased use of lime, and not increased dairy cow numbers. For the dairy sector, 97 of the 102 potential environmental impacts of the strategy will be either non-existent or positive.

Why agricultural expansion is ignored!

It will be hard for environmental NGOs to understand that an environmental assessment of a strategy which is predicated on the biggest acceleration of agricultural growth for thirty years sidesteps this issue entirely, even if strictly it does adhere to its brief of assessing the environmental impact solely of the actions proposed in the strategy itself. How was this achieved?

In preparing any Strategic Environmental Assessment, a requirement is that it should normally involve comparisons between alternative plan or programme scenarios. In this case, three scenarios were considered:

*A **Base Case Scenario** or 'business as usual' scenario which involved continuation of the rate of changes in production levels seen over recent years to generate a moderate increase in output through improvements in technology and management techniques:*

*A **Base Case + Scenario** which takes account of the elimination of milk quotas and the projected expansion in dairy cow numbers planned by farmers and the processing industry, "leveraged by substantial increases in the use of best technology facilitated by enhanced knowledge transfer programmes"-*

*A **Sustainable Growth Scenario** (essentially that adopted in FW2025) which incorporates a set of "guiding strategies" on top of the Base Case + Scenario to mitigate potential environmental impacts. These include:*

- *Investment in environmental monitoring systems;*
- *Investment in science based research which demonstrates that Irish production systems are environmentally sustainable;*
- *The rollout of new technologies and production processes;*
- *The transfer of knowledge to all actors in the supply chain so that necessary productivity efficiencies are achieved.*

Effectively, the Sustainable Growth Scenario is compared to the Base Case + Scenario and not to the Base Case scenario. Thus, the expansion of agricultural, fisheries and forestry output is assumed to be already underway, leaving the SEA to concentrate only on evaluating the environmental impact of these guiding strategies.

This approach may be technically in compliance with the terms of reference of the SEA, but it is hardly adequate as a guide to policy. Indeed, many will see it as a sleight-of-hand to obscure an important debate over the extent to which increased agricultural output can be achieved within the country's environmental boundaries and targets.

What should be done?

My view is that it makes full sense to pursue the expansion of agricultural and food industry output provided this takes place on the basis of the true competitive advantages of the sector (and not on the basis of public subsidy) and provided that the environmental consequences are addressed and fully internalised into decision-making at farm and industry levels. The FW2025 recommendations are sensible and should be pursued, but as we have seen they leave out much of the picture.

The draft Environmental Report recommends a programme of monitoring the environmental performance of the FW2025 strategy. It further recommends that an environmental sub group be convened during the duration of the plan to review the ongoing environmental performance of the plan. This subgroup would have the capacity to reconsider new and additional mitigation and monitoring if considered appropriate during the duration of the plan.

Monitoring only makes sense if the full environmental consequences of the agricultural expansion are taken into account, and not just those associated with the recommended actions contained in the FW2025 strategy. In other words, the fiction underlying the draft Environmental Report that agricultural expansion is something that was pre-existing and should not therefore be considered in the evaluation should be dropped.

To assist the monitoring a full environmental evaluation of the likely consequences of agricultural expansion should be commissioned, together with the preparation of appropriate mitigation strategies. For this purpose, the environmental sub-group should be formed now rather than later. Its first task should be to commission a proper overview of the likely environmental challenges inherent in the expansion strategy behind FW2025."

Quoted from:

http://capreform.eu/food-wise-2025-agri-food-strategy-launched-in-ireland/

The Environmental Pillar would highlight the need for the inclusion of the ENGO sector, through the Environmental Pillar, on the environmental sub group that is proposed to monitor the environmental impacts on the implementation of FW2025.

The Minister has gone on record saying that he expects an additional 300,000 cattle in the country, and that increase in numbers is a strong basis for the projected employment figures in FW2025.

"Farms may expand or consolidate, I can't say for sure which, but we will be creating 10,000 jobs. We will have 300,000 more cattle soon, you need one person for every 100 cows give or take." – Minister Coveney, Farmers Journal, March 2015

That the draft report does not explicitly examine the impact on the environment of such an expansion is a grave omission.

The Environmental Pillar would like to echo and support the points made in the critique of the SEA by Alan Matthews of TCD. The significant section quoted above makes the case for the limitations of the scope of the SEA being such that the environmental impact of the proposed expansion of the sector is simply not examined.

It is also clearly a significant threat to the claims of sustainability, which are central to the competitive advantage of the industry and therefore a critical aspect of the growth plan, that the environmental impacts can be demonstrated to have been overlooked due to a conscious decision to limit the scope of the Draft Report.

4. LACK OF BASELINE DATA and THE PRECAUTIONARY PRINCIPLE

> ***3.13.2 Biodiversity, Flora and Fauna*** **(from the SEA report page 82)**
> *The 'Ireland's Biodiversity in 2010: Knowledge Gaps' report (NBDC, 2010) concludes that Ireland's biodiversity has yet to be fully documented. A small number of groups (e.g. vascular plants, birds, mammals and some invertebrates such as butterflies and molluscs) are well-studied, but significant data and information gaps remain for the large majority of species, and a national habitat map is yet to be prepared. These data limitations will affect the full assessment of effects at both a regional and local level.*

> ***3.13.5 Soils and Geology***
> *Soil productivity and drainage maps are still to be produced, and limited information exists on soil organic matter and soil compaction. These information gaps, together with a lack of spatial detail on the implementation of the Strategy are anticipated to affect the assessment. Recent work by Teagasc in relation to the new Irish Soil Information System will contribute to greater clarity in relation to soils and drainage.17 However, as soil compaction and organic matter content are highly dependent upon localised farming conditions little information exists on localised baseline conditions.*

It is not acceptable to simply state that the lack of data means that the effects of this unprecedented expansion and growth strategy cannot be determined. At the very least a coherent and transparent inclusive strategy needs to be established as part of the Analysis process to ensure the data gaps are filled.

Where insufficient data is available then the precautionary principle needs to be applied in decision making and recommendations.

This is not compatible with finding that for the dairy sector, 97 of the 102 potential environmental impacts of the strategy will be either non-existent or positive.

5. Continued Reliance On The MACC

The use of a Marginal Abatement Cost Curve is limited.
MACC as a tool has been criticised for its over simplification of complex scenarios. The creators of the McKinsey MACC are careful to include the limitation of the MACC in their reports. The MACC used for the basis of this Draft Report is subject to a number of specific limitations and caveats. These caveats are overlooked in this Draft Report, and should be subject to explicit examination and disclosure.
For example the MACC does not include the effect of mitigation actions yet it recognises the likely negative impact on soil and biodiversity likely to result from some mitigation measures. The suggestion that current legislation is sufficient as a mitigation measure is proposed in the MACC and repeated in the Draft Report. This satisfies the need for simplification in terms of the MACC but does not reflect a reasonable reflection of the practical impact of implementing a strategy to achieve the FW2025 targets.

Furthermore, the MACC paper takes its scenario for achieving the growth targets in FH2020 from another report by Donnellan and Hanrahan, *Greenhouse Gas Emissions by Irish Agriculture: consequences arising from the Food Harvest targets.* This is a 20 page briefing note produced by Teagasc. This Donnellan & Hanrahan briefing note expressly states that it is an examination of a scenario whereby the targets for FH2020 could be reached. It goes on to say that many more scenarios are expected to come from the Food Harvest implementation group (page 13). This places the briefing note in the context of a starting off point for examination of implementation possibilities and their consequences. Yet, it would appear that the briefing note scenario forms the basis of the main analysis of FH2020 in 2013 and has now been used again for FW2025.

As an iterative economic modelling tool it has its use but it fails to offer a valued input to an analysis of the impact of the growth on the basic natural capital on which the whole agri food sector depends.

6. The Role of Forestry

The report fails to address the unsustainable forestry model at the heart of the Irish forestry program. A significant shift in the policy of supporting the unsustainable practices of planting monoculture plantations of non-native conifers designed to be clear-felled needs to be part of the industry strategy.

The unsustainability of the forestry program and of the state forestry companies practices needs to addressed if the potential of the carbon storage of forests is to be used as an offsetting tool for increased agricultural emissions.

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This submission was developed using the Environmental Pillar processes but is not necessarily the policy of each member group in the Pillar.

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. Good Energies Alliance Ireland, 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