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Via email and post

Dear Paul,

I set out below some additional comments about the *Strategic Environmental Assessment- Issues Paper* discussed at the recent SEA Scoping Workshop for the Agri-Food 2025 strategy.

General comments on the issues paper

The document seems to lack a general sense of balance. While it points out the environmental challenges the sector faces, the document does not refer to the fact that water quality in Ireland is of a high standard, with 92% of lakes and 71% of rivers classified by the EPA as unpolluted. It also ignores the role of farmers, who have made a significant contribution to this high status, spending over €2 billion upgrading farm-yards, increasing slurry storage facilities and developing farm buildings to ensure they meet the highest standards. This was supported by the substantial investment of the State, under the Farm Waste Management Scheme.

The document also ignores the overall trend of declining chemical fertilizer use, with nitrogen use falling by 60,000 tonnes over the past decade. Furthermore, as I highlighted at the meeting there is no reference in the issues paper to the safeguards provided for the environmental issues identified under the general cross-compliance inspection regime, which covers areas such as soil erosion, soil structure, ground water, habitats, the protection of water generally, the use of new technologies for slurry spreading and reuse of slurry to add back nutrients to the soil.

Multiple objectives of agriculture

Agri-environment policy has evolved at EU level. This was clearly marked by the October 2014 Heads of Government climate policy framework agreement, which importantly recognises that agriculture is different and that, in addition to emitting carbon, the sector also has a positive impact on the environment. It also acknowledges that agriculture has many responsibilities, not only the reduction of greenhouse gas emissions. These include food and fuel production, energy production and environmental protection – all of which must be considered when addressing the climate challenge.

The issues paper seems to have broadly ignored these multiple objectives. It also seems to be examining the national environmental impact of developments and growth of agricultural output in isolation, without having regard to wider European and international policy developments, including trade negotiations. Ireland's carbon efficient model of food production provides a blueprint for the sustainable intensification of the agri-food sector, at a time of increasing global food demand. The potential for increasing global international emissions due to carbon leakage must be taken into account in any proposals on the environmental impact of Agri-strategy 2025.

Carbon efficient model of food production

Ireland is a world leader in sustainable food production, measuring and reducing greenhouse gas emissions throughout the supply chain, whether inside the farm gate or at processor level. No other country can look at its agri-food sector and refer to initiatives such as Origin Green, the quality beef assurance scheme, Smart Farming or the sustainable dairy assurance scheme and say "we are environmentally sustainable at what we produce and it is independently verified". These facts are ignored in the issues paper and therefore do not provide any insight into the measures that the agri-food sector currently have in place to address the climate challenge.

Carbon neutrality for the sector

The statement that "The Irish Government has committed to carbon neutral agriculture by 2050" is inaccurate and should be amended. I understand the position of Government is to move towards carbon neutrality cost effectively, while not compromising the capacity for sustainable food production.

Other relevant plans and programmes

For completeness I suggest that the following plans and programmes are included, in addition to those listed in the issues paper:

- CAP Pillar I
 - SMRs and GAEC
 - Greening
- CAP Pillar II
 - GLAS & GLAS+
 - Beef Data and Genomics Programme
 - Farm investment schemes
 - Knowledge Transfer
- General Rural Development Programme
- Smart Farming Programme

Landscape – potential environmental impacts

The issues paper, when considering the potential impact of the agri-food strategy on the landscape, does not refer to the legal obligations on farmers under the Environmental Impact Assessment (Agriculture) Regulations 2011. This is in addition to the SMRs and GAEC measures that farmers must comply with under cross-compliance. This oversight must be addressed.

Generalised statements

The agri-food sector is Ireland's largest indigenous productive sector, exporting over €10.5 billion worth of food and drink in 2014 and employing over 300,000 people directly and indirectly. The sector trades on its reputation, and therefore generalised statements as contained in the issues paper such as those listed below, which are not referenced, could be misinterpreted as facts and should be reconsidered:

- "Potential for significant effects in human health are mainly anticipated from the dairy and infant formula sector.."
- "This could result in deterioration of surface waters, and potentially groundwaters, with the risk of water contamination and eutrophication....having indirect effects on biodiversity, flora and fauna."

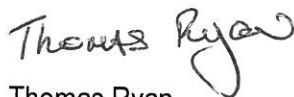
Other general statements, such as those regarding overgrazing, are also not put in context and the extent of this as a potential issue is questioned, given that current policy is seeking to increase stocking rates in commonage areas.

Cost and economic implications of any measures proposed

Any measures proposed in a Strategic Environmental Assessment of the Agri-Food Strategy 2025 must be costed and the economic implication for farmers must be set out. Mitigation measures to offset any additional costs imposed on farmers must form part of the outputs of the Strategic Environmental Assessment.

The issues raised in this letter require your attention to ensure that an accurate and more complete SEA document is published by your Department for public consultation.

Yours sincerely



Thomas Ryan
Environment Executive