



## **Public Consultation in response to Draft Environmental Analysis Report on Food Wise 2025**

*BirdWatch Ireland Submission to the  
Department of Agriculture, Food and the Marine*

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## KEY MESSAGES

It is BirdWatch Ireland's view that Food Wise 2025 falls short not just of delivering the ambition of its rhetoric, such as to 'enhance biodiversity', but that it does not acknowledge the vulnerability of the 'receiving environment' and fails to comply with basic environmental requirements. This is a missed opportunity for the agri-food sector given that it has the potential to address the ongoing damage occurring to natural systems when incentivised and supported to do so. The lack of reference to the status of nature in Ireland and the need for an evidence base behind 'green' or sustainability' claims continue to be areas of substantial concern that Food Wise 2025 and the associated environmental assessment fail to address.

Food Wise 2025 should not only recognise the impacts of productive agriculture, aquaculture and fisheries on the environment, but also seek to address these impacts through proactive concrete actions, and identify specific ways that production and processing can address environmental objectives.

Ireland's biodiversity is facing very severe threats, as evidenced by declining populations of many farmland birds and the loss in extent and quality of many semi-natural habitats in the mosaic of Ireland's farmed landscapes. Declining bird populations often indicate declining health of the natural environment. They reflect losses in habitat extent and quality and often equate to losses in ecosystem services which are a valuable asset to Ireland. **Urgent conservation actions are urgently required to avert continuing catastrophic declines in our farmland biodiversity.** The content of Food Wise 2025 does not make adequate effort to deliver public benefits such as enhancing biodiversity and ecosystem services. It is a significant missed opportunity that the strategy does not make an effort to build resilience in Ireland's agricultural model by up-skilling and rewarding innovation and meaningful delivery of these public goods. Sadly, as well as lacking content to address this, the aspirations identified in Food Wise 2025 are contrary to Ireland's poor record in Europe for non-compliance with environmental law and continued failures to deliver for biodiversity and wider environmental issues.

If the strategy towards 2025 seeks to build upon the "Smart, Green Growth" principles of FH2020, and live up to the rhetoric of enhancing nature while increasing production, then **actions towards addressing environmental impacts of the agri-food sector must be delivered.** Environment protection should be seen as a prerequisite for the sector in Ireland, rather than a challenge to overcome. The content of Food Wise 2025 and its environmental assessment fall far short of achieving this ambition. If we are to maintain Ireland's 'green' image in marketing the agri-food sector, an evidence-base is required to turn this perception into a reality. To do this, **Ireland must proactively support biodiversity and ecosystem services in the farmed landscape,** implementing actions for our most vulnerable species and habitats. **All actions within a new agri-food strategy must also be tested to ensure they are economically, socially and environmentally sustainable.**

If Ireland is to legitimately market produce as being 'sustainable' and from a 'grass-based' production system, then **credible definitions of what these are need to be published.** Unlike certified, 100% grass-based systems elsewhere, Ireland's livestock farming relies substantially on supplementary feeding of meal and concentrates, many of which will be imported. Furthermore, it is clear from data from many sources **that current farming practices in Ireland cannot be considered to be environmentally sustainable,** due to the overwhelming volume of evidence that shows, for example, declines in biodiversity, poor water quality and high greenhouse gas emissions. Even in grass-based farmland, many species using these habitats are declining.

**Food Wise 2025 appears to operate in isolation from a number of policy areas.** It ignores the move to reduce consumption and unsustainable production systems and address issues such as food waste and depletion of natural resources. Sustainable Consumption & Production is a component of the **EU 2020 Strategy's Resource Efficiency Flagship Initiative.** Despite this drive Food Wise 2025 focuses on increased production and resource depletion is a minor component or concern.

Whilst market opportunities can be identified internationally (within the EU and beyond), **there must be focus on the supplying the domestic market.** Reducing Ireland's reliance on imports by meeting the need from domestic producers is important and yet neglected by Food Wise 2025 or the environmental assessment.

Although RDP-funded measures, such as agri-environment-climate schemes, are important for the protection of certain priority species and habitats, where effort can be well-defined and targeted and their impacts can be fully monitored and evaluated, these must be seen outside of Food Wise 2025. These measures are already under pressure to deliver for priority species and habitats of concern. **As the RDP is publicly-funded, any policy to increase the profitability of the agri-food sector must be financed by the agri-food sector.** This could be delivered through new initiatives that internalise the financial costs associated with maintaining (or enhancing) the environment, mitigating or off-setting any damage from the drive to increase profitability.

In our submission we identify potential indicators (Section 2.5) potential actions (Section 2.7 and Section 4) and highlight main concerns about FW2025 as well as the SEA process and our frustration as a stakeholder in the preparation of the strategy.

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## SUMMARY

Previously, Food Harvest 2020 (FH2020) identified the need for a sustainable agri-food sector in Ireland, advanced by credible research and actions including biodiversity conservation. BirdWatch Ireland sees there being huge positive benefits to increasing the value of Irish agricultural produce and supportive of action to achieve this through raising the environmental credentials and credibility of Irish agriculture.

However, these actions must be underpinned by a range of legal and policy commitments and conservation actions to maintain a healthy natural environment. The agri-food sector cannot exist in isolation of the range of national and international initiatives to tackle some of the most pressing issues of our time: the ongoing loss of biodiversity, degradation of ecosystem services, the challenge of climate change, and declining water quality.

Unfortunately, not only has there been no delivery of any strategic plan to tackle environmental issues within FH2020, no actions have been taken to even address the likely damage caused to the environment from the the production-orientated policy focus of FH2020 in any meaningful way. **There would appear to have been little delivery of the “Green” element of the “Smart, Green Growth” allegedly at the core of the FH2020 vision** beyond ‘niche’ elements. Food Wise 2025 should not only recognise the impact of productive agriculture, aquaculture and fisheries on the environment, but also seek to address these impacts through proactive concrete actions, and identify specific ways to address environmental objectives. **Food Wise 2025 has missed the opportunity to move the agri-food sector towards truly sustainable production and processing.**

Much of the focus of FH2020 was setting and achieving specific output targets, some of which were ambitious, but all somewhat arbitrary in determination. **Rather than attaching specific figures to each sector, the scale of ambition should be cognisant of the available resources (both environmental and social).** In terms of the environment, which is perhaps most appropriate to the primary production sectors, the scale must be linked to the ability of natural resources to be exploited in a sustainable way. As new technologies and research becomes available the scale of what is achievable may change. Nevertheless, linking targets to what can realistically be delivered by available resources would be the most appropriate method to determine the scale of what can be achieved. Such an approach also encourages and rewards increased efficiency and innovation, both of which are vital in such a competitive sector. Food Wise 2025 has also failed to recognise this.

Market opportunities need to be identified internationally (within the EU and beyond), but also within Ireland as well. Whilst it is understood that increased exports are desirable, **reducing Ireland’s reliance on imports by meeting the need from domestic producers is equally important.** Further opportunities to explore for the domestic market should also have been considered. **Shortening supply chains by increasing awareness and value of buying produce locally should be encouraged.** This not only rewards local artisan producers, but will also encourage increased social cohesion through supporting rural communities, and encouraging more local, rural enterprises. In addition to the social benefits, artisan producers offering products locally tend to benefit the environment through increase awareness locally and reduced “food miles” linked to products.

**If Food Wise 2025 seeks to build upon the “Smart, Green Growth” principles of FH2020, then actions towards addressing environmental impacts of the agri-food sector must be delivered.** Environment protection should be seen as a prerequisite for the sector in Ireland, rather than a challenge to overcome. Working to create a healthy Irish environment that produces healthy Irish food should support marketing opportunities, in addition to offering substantial benefits to the primary sector through the ecosystem services a healthy environment provides.

Any new strategy must be coherent with other national policies and programmes as well as meeting international legal requirements. A wider cross-section of stakeholders must be involved at all levels with the operation of the programme to ensure this wider delivery of benefits. **As a guiding principle, all actions within a new agri-food strategy must be tested to ensure they are economically, socially and environmentally sustainable.** Where any of the pillars of sustainability cannot be met, the action must be re-designed or rejected. Such an approach would improve the credibility of the sector in addition to the economic, social and environmental prosperity of Ireland.

## 1 INTRODUCTION

There is a recognised growing demand among consumers to buy agricultural produce that helps to meet a range of environmental quality objectives. This is reflected by public statements from An Bord Bia that “sustainability is key to brand agenda” and other industry driven initiatives such as Bord Bia’s **Origin Green** and Glanbia’s **Sustainability Programme** to brand Irish agricultural produce as being environmentally sound. BirdWatch Ireland welcomes and supports policies and actions that ensure Ireland’s agri-food sector can lead the way in delivering environmentally-sustainable produce.

However, currently these aspirations are contrary to Ireland’s poor record in Europe for non-compliance with environmental law and continued failures to deliver for biodiversity and wider environmental issues. Ireland’s biodiversity is facing very severe threats, as evidenced by declining populations of many farmland birds and the loss in extent and quality of many semi-natural habitats in the mosaic of Ireland’s farmed landscapes. The overall target of Ireland’s **National Biodiversity Plan** is “*that biodiversity loss and degradation of ecosystems are reduced by 2016 and progress is made towards substantial recovery by 2020.*”<sup>1</sup> Ireland’s Biodiversity Action Plan also has a specific target for biodiversity in the wider countryside to “*optimise use of opportunities under agricultural, rural development and forest policy to benefit biodiversity.*” Internationally, Ireland has obligations for biodiversity conservation at a European level - preventing biodiversity loss is a priority for the **Europe 2020 strategy**<sup>2</sup>. Target 3(A) of the **EU Biodiversity Action Plan** states that “*By 2020, maximise areas under agriculture across grasslands, arable land and permanent crops that are covered by biodiversity-related measures under the CAP so as to ensure the conservation of biodiversity and to bring about a measurable improvement in the conservation status of species and habitats that depend on or are affected by agriculture and in the provision of ecosystem services as compared to the EU2010 Baseline, thus contributing to enhance sustainable management*”<sup>3</sup>. Ireland also has also made commitments to conserve biodiversity globally as a signatory to the Convention on Biological Diversity<sup>4</sup>.

Ireland’s vision for its agri-food sector must support producers and processors in achieving sustainable, long term food security whilst ensuring a healthy natural environment. **Food Wise 2025** is one of the most significant national policies that could actually address the many threats to biodiversity in the wider Irish countryside, especially given that so many of Ireland’s species and habitats which are in need of conservation action are affected by or dependant on farming practices. **The natural environment is the basis for the health and productivity of Ireland’s agriculture and many rural communities. If Ireland is to meaningfully act to achieve environmental sustainability, there must be a great deal more actions, targeted at addressing these issues.** The vision of FW2025 must contribute to the stepped up response that is required to observed trends of severely declining biodiversity in Ireland’s farm lands and deliver commitments to maximise coherence between biodiversity and environmental protection objectives and agricultural policy and supports.

### 1.1 Farmland Birds in Ireland

Farmland birds across Europe have declined by over 40% in the past 30 years. In Ireland, many previously common farmland birds have suffered major population and range declines since the 1970’s<sup>5</sup>. While Ireland has been farmed for millennia, farming practices existed alongside healthy ecosystems. In recent decades we have drastically changed the way we farm. **Declining bird populations** often indicate declining health of the natural environment. They **reflect losses in habitat extent and quality and often equate to losses in ecosystems services which are a valuable asset to Ireland.** Urgent conservation actions are urgently required to avert continuing catastrophic declines in our farmland biodiversity. A range of measures are also urgently needed for conservation management of semi-natural grasslands, peatland habitats, native woodlands and pristine water bodies, in order for Ireland’s agri-food sector to ensure it meets not just sustainability claims, but also complies with various EU Directives and other international obligations, and can prove these credentials are able to stand up to international scrutiny.

In addition to the delivery of national and international commitments on biodiversity conservation, and the recognised need to integrate actions toward this end into agriculture and other sectors, sustaining biodiversity also has many positive benefits for farming in itself. These are often under-estimated and under-valued even

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1 Department of Arts, Heritage and the Gaeltacht, 2011. *Actions for Biodiversity 2011-2016: Ireland’s National Biodiversity Plan*. Department of Arts, Heritage and the Gaeltacht, Dublin.

2 European Commission. 2010. *Europe 2020: A strategy for smart, sustainable and inclusive growth*. Communication COM(2010) 2020 final, European Commission, Brussels. <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:2020:FIN:EN:PDF> (accessed January 2013)

3 Communication from the Commission to the European Parliament, the Council, the Economic and Social Committee and the Committee of the Regions: *Our life insurance, our natural capital: an EU biodiversity strategy to 2020*. July 2011.

4 Convention on Biological Diversity. 2010. *Strategic Plan for Biodiversity 2011-2020*. <http://www.cbd.int/decision/cop/?id=12268> (accessed August 2012).

5 Colhoun, K. & Cummins, S. 2013. Birds of Conservation Concern in Ireland 2014-2019. *Irish Birds* 9: 523-544.

by the agri-food sector, and include pollination, predator control, maintenance of soil fertility and structure and water management services<sup>6</sup>. According to Bord Bia and others in the agri-food sector, the perceived green image of Ireland gives us a significant competitive advantage when marketing our products abroad. If we are to maintain this image, we need to move urgently to **proactively support biodiversity and ecosystem services in the farmed landscape** and implement measures where species and habitat losses are most pressing.

However, it is well-documented that many modern, intensive farming practices leave little space for birds or biodiversity<sup>7</sup>. Many birds that use farmland habitats that were previously common have suffered major population declines since the 1970's (see Figure 1). In Ireland, these include Lapwing, Corncrake and Yellowhammer, with Corn Bunting (a tillage-specialist) becoming extinct as a breeding bird in Ireland, with the last confirmed breeding in the 1990s<sup>8</sup>.

**Birds are indicators of the health of the countryside.** Like the “canary in the coalmine”, birds can provide early warning systems for the degradation or loss of ecosystems, and the services such ecosystems provide. Birds satisfy many of the criteria of effective indicators, are often used as an early-warning system to detect emergence of environmental problems, and have been widely used to inform decision making and land use management policy including within agricultural ecosystems<sup>9</sup>. The decline in farmland bird populations is telling us that we need to do more to maintain a healthy balance of nature across Irish farmland.

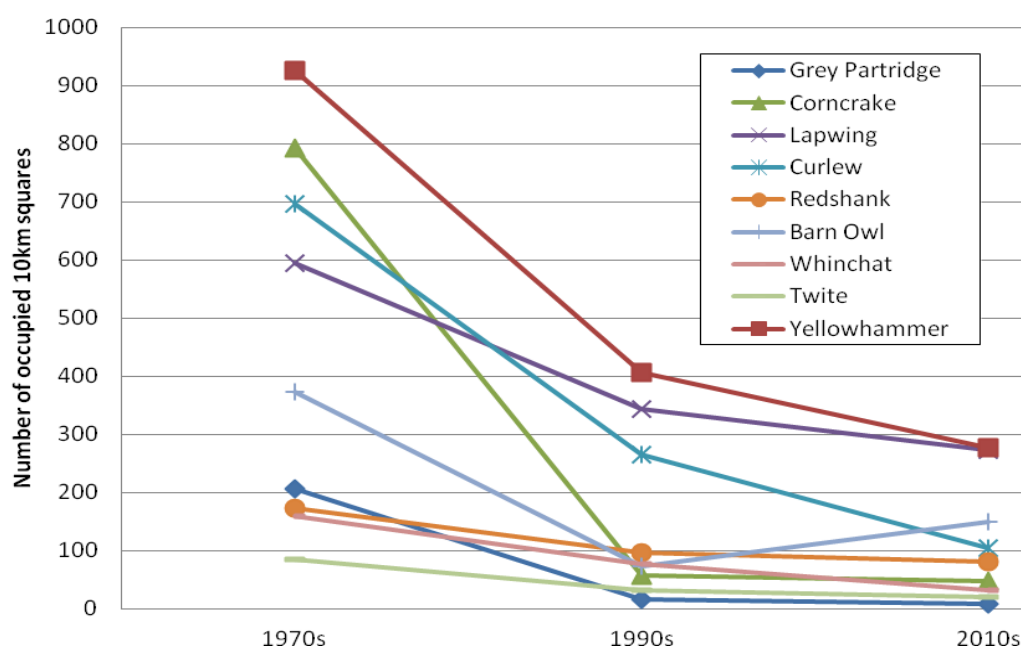


Figure 1: Range (number of occupied 10km squares) in 1970, 1990 and 2010 breeding bird atlases of Red-listed lowland farmland bird species in Ireland

## 1.2 Farmland habitats in Ireland

In addition to species, many sensitive habitats associated with farmland are in a critical condition. Recent assessments have shown that 91% of Ireland's internationally important habitats have a 'bad' or 'inadequate' conservation status. NPWS state that “The most frequent pressures recorded were all related to under-management or abandonment (e.g., under-grazing, succession to scrub or heath, bracken encroachment), although issues related to intensification (e.g., fertiliser application, overgrazing, drainage) were also recorded”.

<sup>6</sup> National Rural Network. 2011. *Biodiversity as a Resource in Agriculture and Rural Development*. [http://www.nrn.ie/wp-content/uploads/2011/08/swig2\\_biodiversity\\_as\\_a\\_resource\\_in\\_agriculture.pdf](http://www.nrn.ie/wp-content/uploads/2011/08/swig2_biodiversity_as_a_resource_in_agriculture.pdf) (accessed August 2012)

<sup>7</sup> Newton, I. 2004. The recent declines of farmland bird populations in Britain: an appraisal of causal factors and conservation actions. *Ibis* **146**: 579-600.

<sup>8</sup> Lynas, P., Newton, S.F. & Robinson, J.A. 2007. The status of birds in Ireland: an analysis of conservation concern 2008 – 2013. *Irish Birds* **8**: 149-166.,

<sup>9</sup> Gregory, R. D., A. van Strien, P. Vorisek, A. W. Gmelig Meyling, D. G. Noble, R. P. B. Foppen and D. W. Gibbons. 2005. Developing indicators for European birds. *Philos. T. R. Soc. B* **360**: 269-288.

In 2013, the overall status of almost all grasslands is “Bad” (see Figure 2). The exception is Calaminarian grassland, which maintained its “Inadequate” conservation status. In addition, heath and scrub habitats are also in decline due to changes in agricultural policies. Both Annex 1 **Dry and Wet heaths** (habitats of our uplands) have historically evolved in Ireland due to appropriate grazing. Changes in grazing practices and other impacts have negatively affected these habitats which also have “Bad” status (see Figure 3). The reasons for this status include *“ongoing losses in habitat area due to afforestation and agricultural improvement. The quality of the habitat has been impacted by overgrazing and trampling, burning, invasive non-native species, drainage and erosion”*<sup>10</sup>

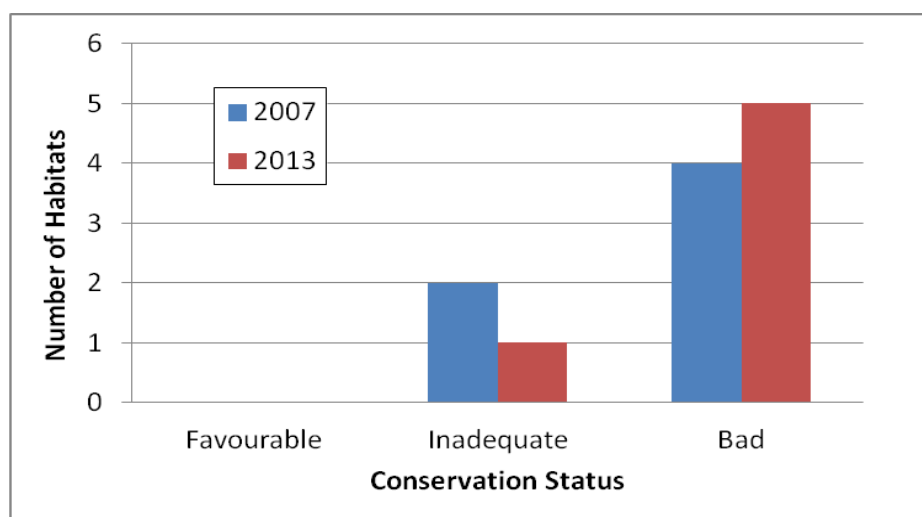


Figure 2: Conservation Status for grassland habitats in Ireland (2007-2013)

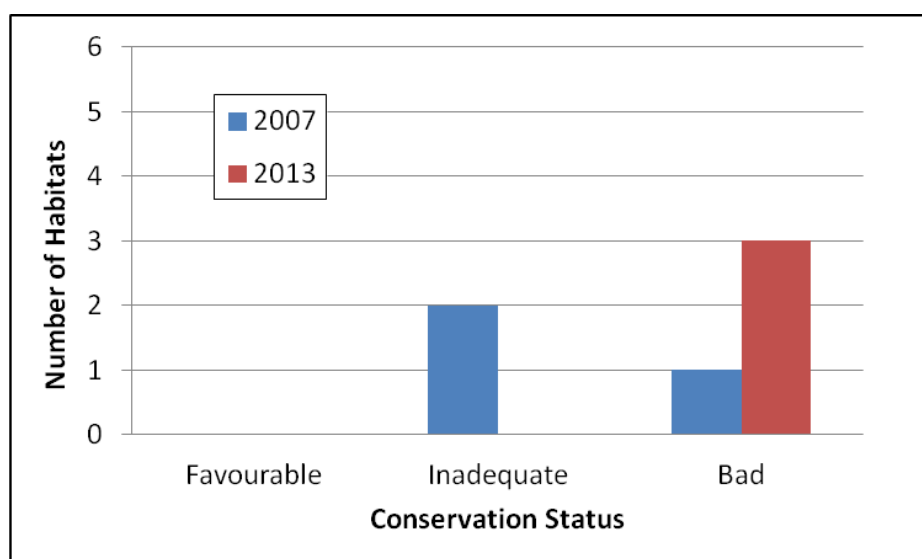


Figure 3: Conservation Status for heath and scrub habitats in Ireland (2007-2013)

### 1.3 Compliance with Environmental Law

In addition to direct and indirect threats to species and habitats within designated sites (SACs and SPAs), there are a number of requirements under European Nature Directives<sup>11</sup> to protect species and habitats outside of designated and protected areas. In the ECJ Ruling C418-04, the Court found that despite a requirement for Member States to “make a serious attempt at protecting those habitats which lie outside the SPAs” Ireland had not “transposed that provision fully and correctly by taking suitable steps to avoid pollution or deterioration of the habitats lying outside the SPAs. It is thus clear, that Ireland must endeavour to take suitable steps to avoid pollution or disturbances of the habitats”<sup>12</sup>. This case is still open.

<sup>10</sup> The Status of EU Protected Habitats and Species in Ireland <http://www.npws.ie/sites/default/files/publications/pdf/Art17-Vol1-web.pdf>

<sup>11</sup> EU Nature Directives [Birds Directive (79/409/EEC) & Habitats Directive (92/43/EEC), Environmental Impact Assessment (EIA) Directive (85/337/EEC as amended by 97/11/EC), and Strategic Environmental Assessment (SEA) Directive (Directive 2001/42/EC).

<sup>12</sup> JUDGMENT OF THE COURT (Second Chamber) 13 December 2007; Paragraphs 179-181 of C418-04



**In pursuing the range of targets associated with any agri-food strategy, such as the increase of production, there will be a general requirement for an intensification of land use.** While in some areas and land types this may be achieved without any significant negative impacts on the natural environment or on protected species and habitats, there may be other cases where this intensification could result in damage to these habitat types and reduced potential for a range of species and habitats to meet the Favourable Conservation Status required by law. It is necessary to develop and implement a range of effective regulatory measures which ensure, beyond reasonable doubt that such impacts will not occur, before such actions are implemented.

The Habitats Directive and the Birds Directive outline a hierarchy of avoidance of adverse impacts, followed by mitigation of those impacts. Mitigation measures are measures which avoid or reduce the impact of the (proposed) activity or activities to the point where the plans or proposals no longer have a risk of an adverse effect. This procedure is laid out in Article 6 of the Habitats Directive and there is a body of guidance and case law which clarifies the requirements.

It is also important to note that European Court of Justice case law against Ireland in the nature and environment field illustrates **Ireland's legacy of failures to adequately implement Environmental Law including the Nitrates Directive, the Birds Directive, the Habitats Directive and the EIA Directive and Regulations.** This situation reflects how Ireland still does not benefit from a cohesive body of legislative instruments, policy and procedures to protect the environment from accelerating degradation and points to the need for assessment of the impacts and measures to mitigate potential impacts at the source of policy developments (e.g. for a new agri-food strategy) rather than any approach which might rely on existing Irish law and policy to ensure compliance.

#### **1.4 Context of this submission**

This submission provides comments in response to the request from the Department of Agriculture, Food and the Marine (DAFM) for a public consultation on the ***Draft Environmental Analysis Report of the Strategic Environmental Assessment (SEA) for Food Wise 2025*** (which also includes a Natura Impact Statement (NIS) and a screening statement for Appropriate Assessment (AA)). However, additional comments relating to wider-ranging aspects of Food Wise 2025 that are directly related to likely environmental impacts but not covered in the various draft reports linked to the SEA. This submission deals with both general considerations on the contexts of Food Wise 2025 and the methodology for the environmental analysis undertaken as well as a detailed evaluation on the contents of the various reports, specifically the environmental analyses presented and the recommendations associated with these.

Although BirdWatch Ireland appreciates that the environmental impacts of Food Wise 2025 cover many areas dealt with in the SEA, including Water, Soil, Air, Climate Change, etc., this submission substantially focuses on Food Wise 2025 impacts on biodiversity, the adequacy of the SEA in addressing these issues and how this has been covered within the various reports presented.

This submission is in two parts:

- The first deals with all aspects of Food Wise 2025 as presented by DAFM in July 2015
- The second part deals with the specific responses to questions posed by DAFM in its consultation document on the draft environmental analysis report of the Food Wise 2025 SEA.

Since this is the first opportunity that has been presented to a full cross-section of stakeholders to provide any comments on Food Wise 2025, substantial focus is given to the first part of this submission.



## 2 GENERAL COMMENTS ON FOOD WISE 2025

There has not been a public consultation on the draft Strategy itself, the current consultation relates to the draft Strategic Environmental Assessment only (and even then is largely restricted to a limited number of questions). BirdWatch Ireland would therefore like to take this opportunity to address some fundamental issues and raise some substantial concerns in relation to Food Wise 2025.

### 2.1 Defining Irish Agriculture

There is a general assumption being made within Ireland's agri-food sector, which is constantly referenced in the Food Wise 2025 document, that the grass-based farming systems in Ireland are sustainable. However, no definition is provided of what this grass-based production system actually is. Most livestock receive nutrition from a variety of sources; indeed Teagasc recommends that grass alone cannot contribute all the energy needs required by cattle for maximal weight gain, with provision of supplementary feed, such as meal or concentrate feed, required to ensure optimum growth of animals<sup>13</sup>. The level of supplementary feeding varies according to the age, breed and use of the animal (e.g. weanlings require different nutrition from cows, and beef cattle have different requirements to dairy cows). **What exactly is meant by a "grass-based system" must be clarified.** In other countries (e.g. the Pasture-Fed Livestock Association (<http://www.pastureforlife.org/>) in the UK) these definitions have been clarified and certification is available for farmers meeting these requirements (for the example here, no concentrate feed is permitted). **If Ireland is to legitimately market produce as being from a grass-based production system, then credible definitions of what these are need to be published.**

### 2.2 Defining Sustainability

In addition to accurately defining the farming systems in Ireland, clarity is also required to define sustainability. It is accepted that there are three pillars of sustainability, economic, social and environmental sustainability. These are highlighted within Food Wise 2025, which states that these three pillars are equally important. However, **it is clear from data from many sources that current farming practices in Ireland cannot be considered to be environmentally sustainable, due to the overwhelming volume of evidence that shows, for example, declines in biodiversity, poor water quality and high greenhouse gas emissions.** Even in grass-based farmland, many species using these habitats are declining (such as Corncrakes, Lapwing and Whinchat), and many grassland habitats themselves are classed as being of "Bad" conservation status. Similarly, demographic data, as highlighted by the recent Commission for the Economic Development of Rural Areas (CEDRA), demonstrates that current farming enterprises, and the wider agri-food sector, are failing to deliver social sustainability, with high unemployment and emigration leading to declining rural populations. **Food Wise 2025 must recognise that the current systems in the agri-food sector are failing to deliver social and environmental sustainability.** Without recognising and addressing these challenges, Food Wise 2025 cannot deliver on its objectives in these areas.

### 2.3 Food Wise 2025 Policy Context

**Food Wise 2025 appears to operate in isolation from a number of policy areas.** It ignores the move to reduce consumption and unsustainable production systems and address issues such as food waste and depletion of natural resources. Sustainable Consumption & Production is a component of the **EU 2020 Strategy's Resource Efficiency Flagship Initiative**. Despite this drive Food Wise 2025 focuses on increased production and resource depletion is a minor component or concern.

The shift in emphasis from production to the delivery of public goods such as biodiversity protection (as seen in the reform of the Common Agricultural Policy with the introduction of "Greening" in Pillar I) is likely to be even more pronounced in the next iteration of CAP (or other future EU agri-food policy). Given the reliance on income supports through Pillar I, and the stated objective of Minister Coveney to ensure these payments are maintained, the agri-food sector is vulnerable to this shift if it **does not make a greater effort to deliver public benefits such as enhancing biodiversity and ecosystem services.** It is a significant missed opportunity that the strategy does not make an effort to build resilience in Ireland's agricultural model by up-skilling and rewarding activities that deliver these public goods.

### 2.4 The Receiving Environment

BirdWatch Ireland is concerned that the Food Wise 2025 will not just fall short of delivering the ambition of its rhetoric such as to 'enhance biodiversity' etc, but that it does not acknowledge the vulnerability of the receiving environment (biodiversity declines) and will struggle to comply with basic environmental regulation (SEA and AA). This is a missed opportunity for the sector given that farming has the potential to address

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<sup>13</sup> For example, Teagasc Beef Advisory Newsletter: <http://www.teagasc.ie/publications/2015/3676/BeefNews-Aug2015.pdf>

damage occurring to natural systems when incentivised and supported to do so – we know this from the work we have done with the farming community and from development of specific measures for biodiversity.

The ambition of Food Wise 2025 must be to go beyond compliance with existing regulations. However, the actions identified to not reflect this, only identifying existing roll out of GLAS and RDP programmes and limited reference to carbon capture related to habitats outside of afforestation. The **GLAS and RDP programmes** are already over-subscribed (by priority habitats and species) with many more species and habitats that could do with these and more emergency measures to address their declines. They **are not proactive measures for nature in that they are emergency measures for priority habitats and species in decline, and are already under-funded and there is not enough of them to address declines in nature related to farming**. They are the emergency measures, in fact Ireland would be facing even further European Court of Justice and European Commission infringement measures if they failed to use these mechanisms to address biodiversity declines.

There is **no indication in Food Wise 2025 as to how this strategy will help us along the road to a low-carbon future** which is required in order for us to achieve internationally agreed targets and to avoid dangerous levels of climate change. **Surprisingly, there is very little mention of climate change mitigation or adaptation or levels of greenhouse gases (GHGs) in Food Wise 2025 though agriculture accounts for a substantial amount of Ireland's overall GHGs**. We call for a reduction of overall GHGs from agriculture so that Ireland plays its part in international efforts to reduce emissions.

Finally, and perhaps most importantly, efforts must be taken to improve ecological functioning within production systems. This would be partly addressed by meeting obligations under the **Sustainable Use Directive (2009/128/EC)**, but efforts to ensure ecosystem services are recognised and preserved must go further than basic legislative requirements. A healthier environment produces more resilient and healthier food. Furthermore, such an approach reinforces the environmental quality associated with Irish food production that the agri-food sector should be seeking to exploit to maintain a competitive edge in national, European and global markets.

## 2.5 Environmental Objectives

Food Wise 2025 aims to ensure that *“environmental protection and economic competitiveness are equal and complementary and one will not be achieved at the expense of the other”*. It also seeks to ensure that *“the three pillars of sustainability are equally important and carry commensurate weight”*. There is no indication from the Plan of how agriculture will ‘go above and beyond’ a ‘business as usual’ approach to biodiversity. The plan does state that *“arresting biodiversity losses while increasing production will be equally demanding”*. **There is no ambition for biodiversity evident in this statement or in the content of the strategy**. This type of ambition, supported by adequately resourced actions, would be manifested in **much-needed indicators** such as the following:

- Reversal of the decline in farmland birds and breeding waders
- Ensuring that agricultural related habitats (grasslands, heaths, scrub, etc.) achieve favourable conservation status.
- Elimination of upland burning of vegetation during the nesting season. Ensuring effective supports to allow farmers to continue appropriate grazing in the uplands.
- Thriving Hen Harrier populations in Hen Harrier Special Protection Areas (SPAs) because of a reduction in afforestation in these areas.
- Farmers in SPAs will be supported financially for other bird species for actions which support the protection of these birds.
- Effective assessment of the locations for future forest plantations and ensuring that biodiversity (species rich grasslands, old pasture, marsh lands, peaty habitats, areas for ground nesting birds such as Curlew and Hen Harrier) is not impacted. Development of strategic planning and assessment tools to assist decision-making.
- Elimination of the persecution of birds of prey, including illegal poisoning.
- Protection, rehabilitation and restoration of peatlands for their carbon sequestration potential and biodiversity richness. This activity will also help to provide local jobs, promote tourism and help support vital ecosystem services.

There is **no ambition for biodiversity in the actions of the Sustainability chapter** which focuses on the environmental footprint of the sector (save for two actions on conservation of fish stocks). **Origin Green** must include birds and biodiversity, as a priority, at all levels of its programme (from producer to processor and in all sectors) to ensure that Ireland's green credentials are real, measurable and to back up any claims that this strategy will not have an environmental impact. All actions which promote energy and waste efficiency in businesses/processors are a welcome addition to help reduce environmental impact.

## 2.6 Balancing Actions

If Food Wise 2025 seeks to build upon the “*Smart, Green Growth*” principles of FH2020, then actions towards addressing environmental impacts of the agri-food sector must be delivered. Environmental protection should be seen as a prerequisite for the sector in Ireland, and **environmental sustainability should not be viewed as a challenge to be met, but rather seen as a baseline upon which the sector must be built and developed.** Working to create a healthy Irish environment that produces healthy Irish food should support marketing opportunities, in addition to offering substantial benefits to the primary sector through the ecosystem services a healthy environment provides. As a guiding principle, **all actions within a new agri-food strategy must be tested to ensure they are economically, socially and environmentally sustainable.** Where any of the pillars of sustainability cannot be met, the action must be re-designed or rejected. Such an approach would improve the credibility of the sector in addition to the economic, social and environmental prosperity of Ireland.

As stated, the Irish agri-food sector trades upon Ireland’s “Green” image of a healthy environment, yet the country has one of the poorest track records of any country in the EU for compliance with international environmental legislation and standards. Failing to meet these legislative requirements threatens not only the integrity of the agri-food sector, but the environment on which it depends and the jobs it creates and supports. An urgent and essential fundamental step towards any future strategy must be to improve adherence to environmental requirements. This requires not only appropriate legislation and oversight, but also enforcement and resources to ensure basic, legal requirements can be met.

However, given the essential need to improve in this area, the opportunity to exceed the basic legislative requirements in the area and enshrine a higher national standard in national policy should be explored. Such an approach would help underpin the credibility of the sector in not just delivering on national, EU and international commitments associated with sustainable agriculture, but exceeding the legislative baselines or standards. Securing this position could offer substantial opportunities for the Irish agri-food sector.

## 2.7 Delivering Environmental Sustainability

The agri-food sector is likely to be driven by consumer sentiment, and these need to be reflected at all stages in the food chain. It is likely that the greatest environmental impacts of Food Wise 2025 will occur at the primary producer (farm) level. Although improvements further down the food chain can benefit resource efficiency, maintenance of water quality and reduction in greenhouse gas emissions, **the greatest impacts on biodiversity, climate change, soil, water and air quality are likely to be delivered at the individual farm level.**

Specifically at the farm-level, and in relation to Ireland grass-based production systems, preventing the ploughing-up of carbon-rich soils and increasing periods between re-seeding for grassland would make a substantial contribution to greenhouse gas emissions and sequestration as well as deliver biodiversity benefits. Similarly, for tillage enterprises wider adoption of minimum tillage practices would be of benefit, as would wider use of lower-emission slurry-spreading rather than higher. For these latter two, which are currently operated in Ireland through agri-environment-climate schemes, mainstreaming them into production agriculture would be beneficial, especially where sectoral efficiencies can be demonstrated. Wetlands on agricultural land and other natural habitats (including peatlands) with carbon capture capacity must be protected, rather than an assumption that monoculture plantation is an appropriate or ‘better’ mitigating measure, particularly in the absence of any supporting evidence.

**Existing (RDP-funded) agri-environment climate schemes (such as GLAS), due to their voluntary nature, are unable to deliver uniform actions across all farms.** Although such schemes are important for the protection of certain priority species and habitats, where effort can be well-defined and targeted and their impacts can be fully monitored and evaluated, these must be seen outside of Food Wise 2025. **As the RDP is publicly-funded, any policy to increase the profitability of the agri-food sector must be financed by the agri-food sector.** This could be delivered through new initiatives that internalise the financial costs associated with maintaining (or enhancing) the environment, mitigating or off-setting any damage from the drive to increase profitability.

Reducing dependency upon external inputs such as chemical fertilisers and pesticides, is also essential. Again, this can be done through appropriate legislation and enforcement, not least by enshrining integrated pest management obligations from the Sustainable Use Directive within Irish legislation and policies. Further improvements in this area, from enhancing the legislative baseline required, could add further value and efficiency, whilst reducing reliance on, and exposure to, such inputs. There are many examples of such best practice, including adoption of the Campaign for Responsible Rodenticide Use (CRRU) code of best practice on all Irish farms. This benefits not just biodiversity, but also ensures that proper care and thought is applied at the farm level to the use of such toxic chemicals.

Aside from agri-environment-climate actions to address specific biodiversity issues, some broader-scale conditionality must be introduced to protect habitats and halt biodiversity declines. In addition to the methods already discussed, the safe use of pesticides, including rodenticides, should be enshrined within basic legislation and requirements for all agri-food producers. Similar basic measures should include the control of invasive species on every farm. The use of existing policy frameworks should be explored in meeting environmental requirements within the agri-food sector. In particular, **conditionality attached to the Basic Payment Scheme, which could be operated through cross-compliance measures within the Horizontal Regulation or the green payments in the Direct Payments Regulation, may offer appropriate mechanisms to address environmental issues.** However additional requirements, funded through the industry itself, must also be developed and delivered to meet environmental sustainability standards. These could include for example not just the protection of hedgerows, but promote appropriate management to ensure the hedgerows network can deliver maximum benefits for the range of environmental and ecosystem services they provide.

Efforts must be taken to improve ecological functioning within production systems. This would be partly addressed by meeting obligations under the Sustainable Use Directive, but efforts to ensure ecosystem services are recognised and preserved must go further than basic legislative requirements. **A healthier environment produces more resilient and healthier food.** Furthermore, such an approach reinforces the environmental quality associated with Irish food production that the agri-food sector should be seeking to exploit to maintain a competitive edge in national, European and global markets. These could include the provision of buffer zones for either important ecological sites (such as designated areas) or to protect ecological functioning within the farmed landscape (such as protection of watercourses and hedgerows).

## 2.8 Specific Considerations for Fisheries and Aquaculture

Halting the loss of biodiversity and ecosystem services is the fundamental principle of the **EU Biodiversity Strategy**<sup>14</sup> with better protection for ecosystems, better management of fish stocks and full implementation of EU nature legislation some of the key targets adopted to help protect biodiversity and ecosystem services. Both fisheries and aquaculture should be in line with achieving environmental objectives. Over-fishing continues to be the norm for a number of Irish fish stocks with significant impacts ecological, social and economic. Even in the context of a reformed Common Fisheries Policy, Ireland's position to allow and support fishing at levels that do not allow stock to recover are not sustainable. The status of fish stocks in Irish waters indicates that much remains to be done in this area – Ireland's current position on sea fisheries is not sustainable.

In terms of **fin fish aquaculture**, there are no species that are sustainable as such. The sustainability of a species depends on its feeding and lifecycle habits, as well as the farming operation. Only species that are plant eaters, who can breed in captivity, and whose farming does not produce high levels of nutrient output can be cultivated sustainably.

Unsustainable aquaculture can negatively impact our oceans and the environment and on local people's food and security. Such impacts include the extraction of marine species from oceans, including wild juveniles vital for future stock growth, increasing the burden on wild fish stocks and having major food security implications; the release of organic wastes (which can act as plant nutrients for harmful algal blooms) and toxic effluents into the oceans; the destruction of coastal ecosystems, displacement of coastal communities and depletion of fresh water sources to build aquaculture ponds.

In the case of **shell fish aquaculture**, compliance with environmental objectives including licensing and environmental assessment and assisting with achieving conservation objectives of Special Protection Areas should be included as a basic ambition of FH2025.

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<sup>14</sup> EU Biodiversity Strategy to 2020 <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52011DC0244&from=EN>

### 3 GENERAL COMMENTS ON STRATEGIC ENVIRONMENTAL ASSESSMENT

To maintain environmental credibility, a full and rigorous Strategic Environmental Assessment (SEA) must be undertaken on Food Wise 2025, following the requirements of the SEA Directive. This must be undertaken at the start of the programme, much as is required for other national policies and programmes, such as the Rural Development Programme (RDP). Where negative environmental impacts are foreseen, the programme must be amended to address such damage. If mitigation measures are proposed, these must be funded through the agri-food sector, in accordance with the Polluter Pays principle, and not left for the public to pay for (as was proposed for FH2020 mitigation measures within the RDP).

#### 3.1 Environmental Analysis Methodology

It appears from the SEA that the environmental analysis has been undertaken based on a holistic vision of the agri-food sector as a whole under three scenarios (Base Case, Base Case+ and Sustainable Growth). However, Food Wise 2025 is based upon delivering defined actions. And, at present, it would appear that the growth targets are being delivered according to these individual recommendations. It is therefore surprising that no analysis of the likely impacts of these recommendations has been undertaken. The broad sweep approach, which aims to cover all the targets and recommendations in large and complex theoretical models, is almost certainly not the most effective way to identify the likely impacts of Food Wise 2025 on the environment. Specifically, if negative impacts are predicted (as is the case), without separating out the recommendations it makes it very difficult to see which one are likely to cause the overall negative impacts in order that the effect of such impacts can be addressed (either through avoidance or mitigation).

#### 3.2 The SEA Process

There has been **very limited consultation in the production of this report with environmental NGOs**. As stated earlier, the lack of engagement with environmental stakeholders has been a feature of the whole Food Wise 2025 process.

- Although a call for submissions in January 2015 was made, no further public consultation has taken place until the publication of the draft SEA report. Consultation is limited to the draft SEA and not the content of Food Wise 2025 itself.
- Given the wide-ranging nature of Food Wise 2025, coupled with substantial impacts on the environment from this policy recommendations (and subsequent actions), this limited level of consultation is not adequate. In particular, the lack of expert opinion and input from biodiversity specialists has resulted in a seriously flawed assessment of likely impacts from Food Wise 2025 on biodiversity (see below). We note the absence of the Department of Arts Heritage and the Gaeltacht (with responsibility for nature protection through National Parks and Wildlife Service) from the stakeholder group.
- BirdWatch Ireland has repeatedly expressed its frustration with the lack of incorporation of its views in the stakeholder process

The SEA **process should inform the final strategy** itself as it is developed, not its implementation. The final plan should be a result of the SEA process. Food Wise 2025 therefore cannot be compliant with the SEA process as it was launched as a final document prior to completion of the SEA!

The SEA leaves more questions than answers. There are **no growth targets listed for any sector in the strategy which makes the assessment difficult**. In this context the precautionary principle must be applied in the final assessment where there are known environmental impacts.

In relation to Ireland's involvement with the **Global Alliance of Climate Smart Agriculture** which is listed as an action in the strategy, this alliance makes no reference to the importance of protecting biodiversity under scenarios of agricultural intensification especially in developing countries and has been criticised for this internationally<sup>15</sup>. Any involvement by Ireland in this initiative which seeks to ensure food security along with promoting adaptation and mitigation in agriculture must ensure the protection and enhancement of biodiversity and ecosystems which are an integral part of human life on this Earth. In many developing countries people are more directly reliant on ecosystems/biodiversity for their survival than we are in Ireland, therefore it is essential that we carry forward the message. Ireland has desire to become a leader in this field and has an opportunity to back up the claims of being an 'ecological friendly sector' internationally as well as nationally. The Department of Agriculture, Food and the Marine (DAFM) must ensure domestic actions and international action reflect the importance of biodiversity protection to sustain humans and agriculture and for

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<sup>15</sup> see Wang Ren 2015; Page 5 of:

<http://csa2015.cirad.fr/var/csa2015/storage/fckeditor/file/Plenary%20sessions%20keynote%20presentations.pdf>

its inherent worth. Failure to ensure protection for biodiversity nationally and internationally will render Ireland's green credentials as meaningless.

The Birds and Habitats Directives<sup>11</sup> have brought about a level of protection for nature in Ireland and sustainable development that would not have been achieved otherwise. This does not mean that we are in a favourable position with the conservation status of habitats and species, but rather the framework is in place and it is effective when implemented.

**Overall, the level of analysis within the SEA and AA in relation to the likely impacts of Food Wise 2025 is weak. Without detailing actions from defined impacts, it is impossible to determine what effect the Agri-food sector will have on the environment. Simply stating that the policy vision of making the sector "sustainable" is not sufficient – concrete and defined actions are required in this regard. Food Wise 2025 fails to deliver these actions, and the SEA and AA does not address the true impacts that this failed vision is likely to have.**



## 4 RESPONSE TO QUESTIONS ON PUBLIC CONSULTATION FEEDBACK FORM FOR FOOD WISE 2025

### 4.1 Do you agree with the approach and methodology used for the Strategic Environmental Assessment?

No. The SEA process requires that the assessment occurs in tandem with the production of the Plan and through an iterative process feeds resulting findings into the production of the plan to ensure sustainable development. **While the SEA process was initiated during the development of the plan, Food Wise 2025 was published as a glossy document, with no indication whether the strategy is/was still in draft form, and officially launched by the Minister for Agriculture, Food and the Marine on July 2 2015.** This occurred in the presence of the media though the SEA and the environmental report was only published in draft format at this time with the public consultation yet to occur. This is not in line with the process or spirit of SEA and undermines from the outset the 'goal' of Food Wise 2025 that *'Environmental protection and economic competitiveness are equal and complementary; one will not be achieved at the expense of the other'*. **It is imperative that the information submitted through this public consultation process will inform the final strategy.** The lessons from the inadequate assessment of Food Harvest 2020 have not been learnt. BirdWatch Ireland would like to highlight that the timeframe for completion of the SEA and AA processes was worryingly short, suggesting a lack of a comprehensive consideration of all aspects. **Furthermore, the SEA Issues paper<sup>16</sup>, written by Dr. John Fry and Dr. Ainhua González of UCD (both acknowledged experts in SEA), which was a good basis from which to begin, highlighted some important issues that are not now present in the published draft SEA; this is unacceptable.** For instance, in the Issues Paper:

- It stated that use of the phrase 'sustainable intensification' would also be problematic since intensification (akin to 'acceleration') is not something that can be 'sustained' (i.e. maintained indefinitely).
- It should be recognised that not all up-coming market opportunities lie in export - or will be targeting exports for their expansion (e.g. craft brewing), and that an import-substitution expansion of the domestic fruit and vegetable sector, in particular, would do much to address national food security.
- The 'polluter pays' principle implies that mitigation of agri-food industry proposals should be sectorally funded rather than devolve to the public purse.
- Our goal is to aim to meet, and indeed surpass, national and international environmental sustainability standards
- **Table 3: Summary of Potential for Significant Environmental Effects in the strategy** suggests potential negative impacts on biodiversity, water (deterioration) and landscape (land use change) from all sectors highlighted in the plan, as well as increases in greenhouse gases from all sectors.
- The **Issues Paper** also raises the following which should be expanded on in the SEA: In addition to the inter-relationship between environmental factors summarised above, the following possible sectoral conflicts within the Strategy are also identified. Potential conflicts between sectoral targets and the carrying capacity of the land. Potential conflict of opinion between sub-sectors over the use of Genetically Modified Organisms (GMOs) and grass reseeding intervals. Diversity of opinion on the role and necessity for high market value organic produce, and its association with health and environmental factors.

**There are no actual 'growth' figures presented in Food Wise 2025 though expansion of all sectors is made very clear.** This makes the SEA process difficult and not genuine. The press release from the Department of Agriculture, Food and the Marine states that "Food Wise 2025 predicts that over the next decade Ireland can; increase the value of agri food exports by 85% to €19 billion, increase value added to the sector by 70% to €13 billion, increase the value of primary production by 65% to €10 billion". It is not clear as to how this is to be achieved.

### 4.2 Have all relevant Plans, Programmes and Policies been identified and considered? If not can you advise of any gaps?

The Group Species Action Plans for Irish Birds<sup>17</sup> produced by BirdWatch Ireland in conjunction with stakeholders have not been taken into account. Delivering a framework that will successfully support and achieve better protection for 'birds in the wider countryside' is the key objective of the plans. The 2007 European Court of Justice Case (C418/04) or 'The Birds Case' as it is better known, highlighted Ireland's failing to do so. These plans were developed through a process of stakeholder engagement and participation, to help inform and identify key actions that would support and conserve birds in the wider countryside, with

<sup>16</sup> <https://www.agriculture.gov.ie/media/migration/agri-foodindustry/2025agri-foodstrategy/environmentalreportafs2025/SEAIssuesPaper170415.pdf>

<sup>17</sup> BirdWatch Ireland. 2011. *Action Plans for Irish Birds*. A project partially funded through the Environment Fund by the Department of the Environment, Community and Local Government. BirdWatch Ireland, Wicklow.



particular recognition of those populations of priority species that occur outside of the Natura2000 protected areas network. The targets and actions listed in the plans are designed to assist decision-makers, policy-makers and conservationists (including government departments and agencies), providing a blueprint of how they can collectively make better and more informed decisions to help support, protect and conserve birds in Ireland. The department of Agriculture needs to play a role in the delivery of these actions.

#### 4.3 Has the relevant baseline data been identified for each objective?

No. There are significant data gaps identified in the report which would imply that the precautionary principle should be applied.

#### 4.4 Are you aware of any additional on-going research or monitoring that should be considered in terms of the baseline environmental conditions?

Yes. Ongoing research on the impacts of forestry on birds<sup>18</sup> being conducted by University College Cork under the ADAPT programme should be included in the final report if the research is finalised. This research, if relevant, should inform any changes to monitoring plans which may be needed for future afforestation and replanting.

#### 4.5 Has the baseline information been correctly interpreted to identify the key challenges and opportunities arising from the plan?

No. There is no presentation within the SEA of the conservation status of flora and fauna in Ireland. Recent national assessments under the Natura Directives (Article 17 Habitat & Species Conservation Assessment Reports & Article 12 Bird species Status & Trends Report) should be considered.

#### 4.6 Do the strategic environmental objectives (SEO's) cover all relevant areas?

No, Whilst the Strategic Environmental Objectives (SEOs) appear comprehensive, **the SEOs are too broad to allow any meaningful assessment of their delivery.** It is perhaps of even greater concern that the SEO Targets are similarly limited. For example, for biodiversity, the only target listed relates to compliance with Article 10 of the Habitats Directive. **The absence of any targets to halt the declines of farmland biodiversity, or the restoration of vulnerable farmland habitats, is a critical failure of the SEA.** It is stated that these SEOs form the basis of the SEA in assessing the draft strategy. Therefore, for biodiversity, the only consideration of the impacts of Food Wise 2025 is on habitats covered by Article 10 of the Habitats Directive. This is despite repeated submissions from BirdWatch Ireland (and other environmental NGOs) calling for full consideration within the SEA of all priority species and habitats likely to be impacted by Food Wise 2025 actions.

#### 4.7 Do you consider that the alternative strategies outlined are reasonable and have been assessed correctly?

No. The SEA states that **Base Case** scenario which is described as 'continuation in the rate of changes in production levels seen over recent years to generate a moderate increase in output – essentially a business as usual scenario – has the 'potential for less sustainable agricultural, forestry and seafood sectors and in the absence of effective management and monitoring of discharges/emissions and disturbance arising from these sectors, there would be an overall slight negative impact'. This statement can be deduced as **an admission that current agricultural practices knowingly are not meeting the legal requirements of the Birds and Habitats Directives and are allowing the deterioration of internationally important habitats and species.** 'Business as usual scenarios' mean that activities must be in compliance with the applicable environmental laws and policies of the time period.

In relation to the **Base+** scenario, it is described as 'more ambitious levels of expansion than recent historical trends. In the case of the dairy sector it might be achieved by expansion in dairy cow numbers leveraged by substantial increases in the use of best technology facilitated by enhanced knowledge transfer programmes'. It has the potential to have a 'significant negative effect on the receiving environment'. These scenarios must be in compliance with the applicable environmental laws and policies of the time period. It is unacceptable that Base Case and Base Case + scenarios casually describe the potential for impacts on the receiving environment. If this is the case then the 'polluter must pay' and compensation to be awarded for impacts under the

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<sup>18</sup> ADAPT: <http://www.ucc.ie/en/forestecology/research/adapt/>

*Environmental Liability Directive*. At the very least the **Base Case** and **Base Case+** scenarios further undermine this second SEA process of an Agricultural strategy as lacking in fact and integrity.

The use of the presented **Base Case** scenario and statement that this would have a 'moderate negative' impact on biodiversity and internationally protected species and habitats is tacit admission that the Government is failing to meet already established obligations under the Birds and Habitats Directives. This is unacceptable but demonstrates the gross failures of Irish agriculture policy to protect Ireland's most special habitats and species not to mind the failures in protection of biodiversity outside of designated areas. In addition, this current business as usual scenario is having more than a moderately negative impact on biodiversity when one considers the following:

- Decline in farmland birds and severe declines in breeding wader populations (e.g. up to 80% decline for Curlew) with insufficient protection of these birds in the wider countryside
- That 91% of habitats in Ireland including grasslands have 'bad' or inadequate status<sup>19</sup>
- The number of Red-listed bird species currently stands as the highest ever<sup>5</sup>.
- Increased overall agriculture-related GHGs.
- Increase in afforestation – resulting in habitat loss, species decline and other adverse environmental impacts e.g. acidification and increased run-off into river catchments.
- Illegal burning of upland vegetation during the nesting season is devastating priority habitats and species. Impacts of upland burning reduces upland ecosystem services (e.g. carbon stores/sequestration, water filtration, flood management, eco-tourism)
- Hedgerows: Lack of hedgerow management. Removal of hedgerows. Lack of requirement for farmers to use local hedgerow tree and shrub species of native Irish provenance.
- Hen Harrier: Threats to Hen Harrier (inadequate designation of SPAs, threats caused by afforestation of their preferred habitat, persecution). Irresponsible use of rodenticides killing birds of prey.
- Habitat loss & deterioration in habitat quality negatively impacting on birds in the wider countryside
- Wholly inadequate funding of NPWS Farm Plan Schemes to protect internationally important species (e.g. Corncrake Farm Plan Scheme). Also ineffective administration of the scheme.
- Lack of enforcement of Wildlife law. No wildlife crime officers. Three priority areas that require urgent attention:
  - Improving enforcement & reporting of wildlife crimes
  - Developing adequate training and guidance
  - Delivery of awareness initiatives and measures
- Lack of funding, lack of research, inadequate protection in law for some species.

#### **4.8 Do you think that cumulative and trans-boundary impacts have been assessed fully?**

No. While obvious trans-boundary impacts such as Air Quality measures briefly get a mention, there needs to be a more in-depth assessment of the likely cumulative and trans-boundary impacts if this policy document (FW2025) is to live up to its claims of sustainability. The statement that there are '*no consequent transboundary effect predicted as a result Agri-Food Strategy 2025*' is alarming.

Birds do not respect borders and in terms of addressing widespread existing losses in biodiversity and further cumulative impacts of activities by key sectors outlined i.e. agriculture, forestry and fisheries (including aquaculture), there needs to be closer cooperation with relevant partners and agencies in Northern Ireland to ensure that any planned changes in production, planting, harvesting (Fisheries & Aquaculture) etc., do not adversely impact on biodiversity (including priority species and habitats) on an All-Ireland basis.

#### **4.9 Do you agree with the assessment outcomes and potential impacts addressed?**

No. Since there are no targets presented for each sector, it is not possible to determine the actual environmental impacts and subsequently any potential mitigation measures to come to an overall decision on environmental impacts. The SEA states that 'growth opportunities and innovation' will bring about a 'slight negative effect on biodiversity' and that 'Broadly all other actions within the draft *Agri-Food Strategy 2025* are predicted to have an imperceptible or slightly positive effect on biodiversity'. It is unclear how this conclusion can be reached. The precautionary principle should apply if there is doubt.

Specifically, Section 9.1.2 of the Environmental report states that a slight negative impact to grasslands is predicted with Food Wise 2025. Uncertainties in relation to the consequences of some actions in relation to grassland management have been deemed to represent a slight negative threat.

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<sup>19</sup> <https://www.cbd.int/doc/world/ie/ie-nr-05-en.pdf>, pg 24.

In relation to grassland, heath and scrub habitats, the SEA does not provide a complete analysis or mitigation measures for their protection. Many bird species are dependent on these habitats and their enhancement from 'bad' status is essential. Greater ambition needs to be shown in the strategy for the protection of these habitat types within and outside of Special Areas of Conservations (SACs) and SPAs.

**4.10 Do you agree with the list of mitigation measures and monitoring proposed? Are there any further measures you consider should be included?**

No. SEA requires devising mitigation measures to avoid, reduce, remedy or offset the potential for significant adverse effects as identified in the plan. The current measures are not adequate and the impacts not fully assessed. For example, **Origin Green** is regularly mentioned within mitigation, yet (at present) delivers nothing tangible for biodiversity. Similarly, no mention is made of overall Greenhouse Gas reductions.

Maintenance of populations and ranges is not sufficient as this implies maintaining the status quo which for many habitats and some species is at a very low level and not meeting the goals of the Directives. The goal should be for the Achievement of favourable conservation status for internationally important habitats and species with a time scale. The reversal in decline in farmland bird species including breeding waders must also be shown as an indicator. Biodiversity in the wider countryside must have a greater focus. The carbon inputs and outputs from afforestation must be measured to show the net carbon gain from afforestation. Afforestation would benefit from a bird Forest Sensitivity Map to aid in planning new plantations. A move to create further native woodlands, in the right places, would be positive. However, poorly planned afforestation could negatively impacts some of our most threatened birds species and most vulnerable habitats. All peatlands need to be restored to ensure that their potential for carbon sequestration is realised.

With respect to *Seafood Sector Mitigation Measures* – outlined in the draft SEA, there needs to be recognition that the impact of the expansion of shellfish and aquaculture production can have wider-reaching impacts on the environment and biodiversity, than just in protected areas. Monitoring should not be restricted to Natura2000 sites only, but should be carried out at all sites as best practice. This applies to both fin-fish and shell-fish aquaculture operations.

**4.11 Are you aware of any further environmental information that will help to inform the environmental assessment findings?**

Yes. The implementation of actions in BirdWatch Ireland's Species Action Plans<sup>20</sup> would aid in the protection of birds in the wider countryside. As outlined earlier, the action plans provide a framework to help achieve and supports better protection for 'birds in the wider countryside' and help to address key aspects of the 2007 European Court of Justice Case (C418/04) or 'The Birds Case' as it is better known. These plans were developed through a process of stakeholder engagement and participation, to help inform and identify key actions that would support and conserve birds in the wider countryside, with particular recognition of those populations of priority species that occur outside of the Natura2000 protected areas network. The targets and actions listed in the plans are designed to assist decision-makers, policy-makers and conservationists (including government departments and agencies), providing a blueprint of how they can collectively make better and more informed decisions to help support, protect and conserve birds in Ireland. Recent assessments of bird species and populations in Ireland (through Article 12 Reporting under the Birds Directive & Birds in Europe III and through Birds of Conservation Concern in Ireland 2014-19<sup>5</sup>), have helped identify imminent species/species group priorities. Further information on these priorities is provided in a recent report by BirdWatch Ireland<sup>21</sup>. This review has considered the cross-cutting nature of the actions across the action plans themselves and across EU, national and sectoral policies to help achieve better and more effective implementation, thereby ensuring better outcomes for 'birds in the wider countryside'. Furthermore, sectoral priorities within the plans, have also been identified and can be found on the BirdWatch Ireland [website](#).

**4.12 Do you have any other comments you wish to make on the Food Wise 2025 and/or the related SEA Environmental Report and Natura Impact Statement?**

Yes. See Section 2 and Section 3 of this document.

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<sup>20</sup> BirdWatch Ireland. 2011. *Action Plans for Irish Birds*. A project partially funded through the Environment Fund by the Department of the Environment, Community and Local Government. BirdWatch Ireland, Wicklow.

<sup>21</sup> BirdWatch Ireland (2014) BirdWatch Ireland's Group Species Action Plans for Irish Birds: Prioritisation of actions, species priorities and implementation. BirdWatch Ireland, Kilcoole, Co. Wicklow.