

## Trócaire Submission to Consultation on Environmental Analysis of Food Wise 2025, 28<sup>th</sup> August 2015.

Trócaire welcomes this Consultation on the environmental analysis of Food Wise 2025 Strategy and looks forward to contributing further to the Strategic Environmental Assessment (SEA) process and to the finalisation of the draft Food Wise Strategy.

Trócaire's research with partner organisations in developing countries, combined with the overwhelming scientific evidence, has highlighted the profound detrimental effects of increasing emissions for global development, food security and poverty eradication both now and into the future.<sup>1</sup> Most recently Trócaire's 2014 report *Feeling the Heat* comprised a comprehensive review of observed changes in climate and its negative impacts in programme countries, including on small scale farming which the majority of poor communities depend on for their livelihoods.<sup>2</sup>

Agricultural emissions are a major driver of climate change. In Ireland agriculture alone is responsible for 32% of national emissions<sup>3</sup> and reductions across all sectors are necessitated by national and EU law, as well as international commitments based on the latest available scientific evidence. It is in this context that the proposed industry strategy and its environmental impacts cannot be viewed as separate from questions of climate. The environmental assessment and finalisation of the draft Strategy must be informed by the principle of climate justice such that Ireland does its fair share to reduce emissions in the global effort based on responsibility and capacity.

Trócaire's principal concern is that, notwithstanding constructive measures being undertaken by farmers and local communities, actions chosen in the draft Strategy may 'lock-in' significant increases in emissions counteracting climate objectives, adversely impacting vulnerable communities and jeopardise Ireland's ability to meet its emission reduction commitments.

The following areas must be addressed as part of the completion of the SEA and are discussed in more detail in subsequent sections of the questionnaire:

- **There is insufficient analysis and corresponding quantitative data on emissions increases associated with the level of expansion detailed in the proposed Strategy.** Information is also lacking on the uptake and emissions savings of mitigation measures. Therefore the environmental impacts of emissions increases, stemming from the proposed expansion, are not adequately assessed
- **Emissions reduction objectives under the Climate Change Bill, EU law and UNFCCC commitments must inform the development of the draft Strategy.** They appear as considerations to be taken into account, however the Draft Environmental Report does not address the need for the Strategy to be aligned with these requirements.
- Baseline data and scenarios are based on the draft Strategy proposals involving significant production increases. The use of proposed actions from the draft Strategy as a starting reference point results in proposed increases being mistakenly presented as already underway. As a result current, and proposed impacts, in particular on emissions, are not properly analysed. **The assessment of the noted 'Do Nothing'**

---

<sup>1</sup> See for example [Changing Lives: Climate Change in the Developing World](#), 2008; [Climate change: Trócaire's policy recommendations](#), 2011; [Shaping Strategies: factors and actors in climate change adaptation](#), 2012.

<sup>2</sup> Trócaire, [Feeling the Heat, How climate change is driving extreme weather in the developing world](#), 2014.

<sup>3</sup> Agriculture and land use change is already responsible for 24% of the world's emissions. Department of Agriculture, Food and the Marine (January 2015), 'A discussion document on the potential for Greenhouse Gas (GHG) mitigation within the Agriculture and Forestry sector', public consultation, Climate Change and BioEnergy Policy Division

scenario should be incorporated into the SEA and used as the starting point for comparison of actions and mitigation under other scenarios.

- **The scoring system is extremely unclear and there is insufficient information to support conclusions** that the implementation of the draft Strategy is likely to have positive effects and that transboundary impacts will be prevented.
- Action under the Strategy should not hinder efforts to ensure food security in developing countries. **The assessment should include a review of the draft Strategy in light of legal requirements under Policy Coherence for Development**, as previously noted as part of the scoping consultation.

**Taking the above into account, further analysis and information are necessary in order to ensure that a comprehensive, clear and adequate SEA is completed. It is also critical that this information informs revisions to the draft Strategy;** Trócaire wishes to engage constructively with the Department of Agriculture and Marine (DAFM) in this process so emissions can be decreased in urgent, equitable and effective manner.

## Consultation Feedback Form

**Project:** Food Wise 2025  
**Organisation:** Department of Agriculture, Food and the Marine

Question	Comments
Do you agree with the approach and methodology used for the Strategic Environmental Assessment?	<p><u>Methodology</u></p> <p>The following shortcomings in the SEA approach and assessment methodology must be addressed</p> <ul style="list-style-type: none"> <li>• Actions proposed in the Strategy should be reviewed to ensure they do not counteract national and international emissions reduction commitments.</li> <li>• The exclusion of any quantitative emissions data prevents an in-depth assessment of the strategies.</li> <li>• The Sustainable Growth Scenario should not only be compared with 'Base Case +' scenario. An assessment of the stated 'Do Nothing' scenario should also be incorporated.</li> <li>• EU requirements under Policy Coherence for Development must be taken into account to ensure policies do not contradict development objectives.</li> </ul> <p><u>SEA, AA and Strategy Drafting</u></p> <p><b>A revised Strategy must be based on an updated Draft Environmental Report analysis and consultation responses.</b> It is noted that the objective of SEA is to inform the drafting of the proposed Strategy and the drafting process is clearly set out in Table A and summarised in Figure 1.3. Under Stage B in Table A it is noted that a 'decision' has already been made on the Strategy based on the alternatives assessment which has taken place prior to the preparation of the draft Environmental Report and consultation [Stages C and D]. It is also stated on the DAFM website that the draft environmental assessment has already been taken into account as part of the drafting the Strategy report, launched in June. <b>A revision of the Strategy based on must form part of the 'finalisation' stage of the Strategy, as noted in Stage E.</b> <sup>4</sup></p>
Have all relevant Plans, Programmes and Policies been identified and	<p><u>National and International Climate Commitments</u></p> <p><b>Ireland's 2050 objective under the Climate Change Bill<sup>5</sup> and National Climate Policy Position, as well as international agreements under the UNFCCC must inform the development of the draft Strategy.</b> In its most</p>

<sup>4</sup> It is also noted on the DAFM website that the final Environmental Analysis Report is planned to be presented to Minister Coveney in the middle of September. A two-week turn around may not allow sufficient time for adequate review and follow-up analysis for the updated Draft Environmental Report. A later date should be envisaged.

<sup>5</sup> The Climate Action and Low Carbon Development Bill 2015

<p>considered? If not can you advise of any gaps?</p>	<p>recent analysis the EPA has underlined that 'Ireland is not on track towards decarbonising the economy in the long term in line with the Climate Action and Low Carbon Development Bill 2015 and will face steep challenges post-2020 unless further policies and measures are put in place over and above those envisaged between now and 2020.'<sup>6</sup></p> <p>It is also noted in the draft Natura report that – 'The EPA recognises that while there are benefits to [the approach of growing production while controlling emissions based on a "sustainable intensification" model], it is unlikely that it will be able to deliver the emission reductions that are necessary if overall national emissions are to be lowered, and if Ireland is to meet its international obligations.' The SEA must address how the Strategy should be revised to ensure overall emissions reductions in line with these requirements.</p> <p><u>Policy Coherence for Development</u></p> <p>It is noted in the Draft Environmental Report that the proposed expansion of meat and dairy exports is linked to increasing demand particularly in developing countries for protein-based foods from new middleclass customers. It is of fundamental importance that Strategy is not substantially based on meeting demand for certain high-end products.</p> <p>Ireland's Policy for International Development <i>One World, One future</i> includes Global Hunger and Climate Change and Development as priority areas for action around which Ireland's international development programmes and engagement will be planned.<sup>7</sup> Trócaire noted at the April Scoping Workshop and in subsequent correspondence, that EU requirements under Policy Coherence for Development<sup>8</sup> (PCD) must be taken into account to ensure policies do not contradict Ireland's development objectives.<sup>9</sup></p> <p>This means that proposed actions must be reviewed and if necessary, developed with adequate safeguards to ensure that they do not result in unintended impacts on the rights and resilience of vulnerable communities. An overview of <u>potential risks</u> requiring further analysis as part of PCD is set out below:</p>
---	--

<sup>6</sup> The Environmental Protection Agency, Ireland's Greenhouse Gas Emission Projections 2014-2035, 18th May 2015

<sup>7</sup> Both the Departments of the Environment and Finance also noted that principles of sustainable development must be incorporated into the preparation of the Strategy.

<sup>8</sup> Since the signing of the Lisbon Treaty in 2009, Policy Coherence for Development is a legal obligation of all EU member states. Article 208 states that all EU policies must take into consideration development objectives

<sup>9</sup> Trócaire Briefing Paper Achieving Policy Coherence for Development through a Whole of Government Approach September 2013  
<http://www.trocaire.org/sites/trocaire/files/resources/policy/achieving-policy-coherence-for-development.pdf>

# Trócaire

Working for a just world.

	<ul style="list-style-type: none"> <li>- <b>Emissions:</b> Export driven large-scale agriculture is highly emitting. The effects of these increasing emissions from large-scale agriculture are undermining livelihoods in developing countries and pose huge risks to food security particularly in developing countries.<sup>10</sup></li> <li>- <b>Market Distortions:</b> Subsidized EU agriculture exports to developing countries have served to counteract the development of local markets by displacing local production while adding to emissions through long-haul transport.<sup>11</sup> Dumping of subsidized meat products which do not internalize the full environmental and social costs of production products is a particular risk.</li> <li>- <b>Displacement:</b> An increasing dependence on animal feed imports to increase production can also inadvertently results in 'land grabs', where land needed by local/ communities for their own food production is being taken over to raise animal feed.<sup>12</sup> This can also result in increases of the cost of associated food stuffs such as grain.</li> <li>- <b>Food Security and Displacement:</b> Actions which incentivise imports of first generation biofuels should not be supported due to the devastating effects of biofuels expansion on land resources and food growing areas in developing countries (often through 'land grabbing'). The effects of Indirect Land Use Change have also meant that such biofuels production often does not result in significantly lower carbon emissions.<sup>13</sup> Small-scale farmers also risk being marginalized or displaced from their land.<sup>14</sup> This is particularly relevant to the contribution of DAFM to the impending Bioenergy Action Plan.</li> </ul>
--	---

<sup>10</sup> Trocaire, [Feeling the Heat, How climate change is driving extreme weather in the developing world](#), 2014.

<sup>11</sup> See Who feeds the world? The impacts of European agricultural policy on hunger in developing countries 2011 [http://www.misereor.org/fileadmin/redaktion/MISEREOR\\_Who%20feeds%20the%20world.pdf](http://www.misereor.org/fileadmin/redaktion/MISEREOR_Who%20feeds%20the%20world.pdf) ; Slow Trade – Sound Farming A Multilateral Framework for Sustainable Markets in Agriculture [http://www.misereor.org/fileadmin/redaktion/slow\\_trade\\_sound\\_farming.pdf](http://www.misereor.org/fileadmin/redaktion/slow_trade_sound_farming.pdf) Heinrich Böll Foundation and MISEREOR 2007; [http://www.actionaid.ie/sites/files/actionaid/milking\\_the\\_poor.pdf](http://www.actionaid.ie/sites/files/actionaid/milking_the_poor.pdf) Action Aid Milking the poor How EU subsidies hurt dairy producers in Bangladesh September 2011

<sup>12</sup> CIDSE Agriculture: from Problem to Solution - Achieving the Right to Food in a Climate-Constrained World [http://www.cidse.org/publications/just-food/food-and-climate/agriculture\\_from\\_problem\\_to\\_solution.html](http://www.cidse.org/publications/just-food/food-and-climate/agriculture_from_problem_to_solution.html)

<sup>13</sup> See Trócaire [Submission to the Green Paper on Energy Policy in Ireland](#), 2014 and Trócaire Briefing Paper, [Biofuels: fuelling poverty and environmental degradation](#), 2013

<sup>14</sup> International Assessment of Agricultural Knowledge, Science and Technology for Development (IAASTD), Agriculture at a Crossroads, Synthesis Report, 2009

	In light of the above risks, an assessment of the potential impact of proposed actions should be carried out by the Inter-Departmental Committee on Development (or Sub-Committee for Sustainable Development Goals as appropriate) as soon as possible. <sup>15</sup>
Has the relevant baseline data been identified for each objective?	<p>No. The baseline is based on significant emission increases for which quantified information has not been included.</p> <p>Complexities in developing detailed, up to date and accurate emissions information for specific actions at specific points in time cannot be dismissed. However, it is not appropriate that indicative projections or extrapolations from existing data, research estimates for the sector based on analysis carried out by the EPA and/or Teagasc have not been included. This is particularly confusing when historical and projected GHG emissions data was included in the environmental assessment conducted for Food Harvest 2020. <u>It is not appropriate for emissions information to only be presented as part of a subsequent implementation plan when such information is intrinsic to choosing appropriate actions under the Strategy [see Section 3.13.3].</u></p> <p>See also response to question re mitigation measures below.</p>
Are you aware of any additional on-going research or monitoring that should be considered in terms of the baseline environmental conditions?	See necessary monitoring in relation to emission reduction objectives and PCD detailed above.
Has the baseline information been correctly interpreted to identify the key challenges and opportunities arising from the plan?	<p>No. See responses above concerning long-term emission reduction objectives and the absence of emission information in relation to the baseline.</p> <p>See also the need for analysis on likely impact of increasing emissions on Irish agriculture and the environment below.</p>
Do the strategic environmental objectives (SEO's) cover all relevant areas?	- The Draft Environmental Report correctly refers to the general objective GHG reductions requirements as part of the National Low Carbon Transition & Mitigation Plan. However, this objective appears with the caveat that such reductions are to be implemented as part of the Plan ' <u>once finalised</u> '. While the relevant Climate Bill will be enacted in near future, it is important to be clear that <u>the requirement to take sectoral measures to immediately reduce is already in place</u> . Such reductions are related to, but not dependent upon, the final development of the

<sup>15</sup> This is in line with the recommendations of Dr Bruce Campbell that a whole of government approach to implementing change in sector by including multiple stakeholders and departments. <http://www.iea.com/events/climate-smart-agriculture-facilitating-change-globally-and-nationally> Dr Bruce Campbell, CSA Facilitating Change Globally and Nationally IIEA/RDS lecture series 25 May 2015,.

	<p>Low Carbon Transition &amp; Mitigation Plan. <u>It is the draft Strategy itself which must be reviewed and brought into line with Ireland's low carbon transition objectives as part of the development of the Low Carbon Transition &amp; Mitigation Plan.</u></p> <p>- A failure to carry out this analysis and implement changes to the Strategy, in particular those which would result in actual increases in emissions, would constitute a damaging approach. It is also important that sectoral emission reduction measures necessitated by EU law, international commitments, as well as by the development of the National Low Carbon Transition &amp; Mitigation Plan <u>should not take proposals under the draft Strategy as a starting point.</u></p> <p>- DAFM is part of the relevant interdepartmental steering group overseeing the development of the Low Carbon Transition &amp; Mitigation Plan. Prior to the finalisation of the draft Strategy, necessary follow-up analysis on emissions as part of completion of the SEA should be examined by this steering group and should also be informed by the views of the National Expert Advisory Council.</p>
Do you consider that the alternative strategies outlined are reasonable and have been assessed correctly?	<p>No. See above response regarding the lack of quantified information on emissions increases. While it is accepted that inclusion specific headline quantitative production 'targets numbers' may not have been suitable, the exclusion of any quantitative data prevents any in-depth assessment of the strategies.</p> <p>- It is not considered appropriate that, while it is stated that a 'Do Nothing' scenario has been assessed, <u>the results of that assessment are not shown.</u> It is stated that this omission is due to the fact that such a scenario 'is not considered a realistic alternative'. <u>In the interests of a complete assessment, analysis of all scenarios should be presented so interested parties can submit their views.</u></p> <p>- The Report also details that the Base Case Scenario involves changes in production 'to generate a moderate increase'. Confusingly, however, it is later incorrectly stated that this Scenario 'can be likened to a do nothing scenario'. There evidently needs to be a clear distinction on actions taken or not taken between the two scenarios.</p> <p>- It is stated in the Draft Environmental Report that the Sustainable Growth Scenario was developed in light of the fact that an increase of 30% in dairy numbers (reaching 1.4 million) under the 'Base Case +' scenario '<i>would potentially breach Ireland's international environmental commitments, especially GHG's.</i>' It should be noted that the Base Case scenario would also likely result in breaches of international commitments in the absence of additional emission reduction measures are put in place over and above those envisaged between now and 2020. (see latest EPA analysis noted above).</p>



	<p>- In relation to the Sustainable Growth Scenario, it noted that the relevant actions will deliver 'the best available environmental outcomes'. However, notwithstanding positive environmental actions under this Scenario, <u>it does not address any changes to proposed increases in production. It is also not considered appropriate that the Sustainable Growth Scenario is only compared with Base Case + scenario such that level of production proposed in the draft Strategy is taken as already decided upon.</u></p> <p>- It is stated that assessment of sustainability actions of the strategies set out in Table 4-1. are detailed in Table 9.2. However, the information noted in Table 9.2 is simply a summary of those results combined with points made regarding mitigation actions in Section 6. This overview is inadequate and more detailed information is necessary to adequately assess the proposed mitigation of environmental impacts under the Sustainable Growth Scenario.</p> <p>The scoring of the scenarios is addressed in relation to the assessment outcomes below.</p>
Do you think that cumulative and trans-boundary impacts have been assessed fully?	<p>The scenarios put forward in the Draft Environmental Report, and in particular emissions increases as part of these scenarios, may have significant adverse impacts on vulnerable communities and risks undermining Ireland's development policy. Requirements under Policy Coherence for Development are therefore relevant. Further information on possible significant negative effects is present in the 2<sup>nd</sup> section on 'Plans, Programmes and Policies'</p> <p>Adverse effects associated with changes in climate as a direct result of increasing emissions will especially impact already vulnerable communities in developed and developing countries alike. This is true of Ireland where a range of projected impacts such as increasing average temperatures, extreme weather conditions, flooding, pests and diseases have been detailed. Such impacts represent a significant threat to Irish farmers and farming.<sup>16</sup> <u>Therefore, short, medium and long-term climate impacts on the environment, particularly for Irish farming and farmers, require further in depth analysis as part of the SEA.</u> As noted in EPA's 2015 Guidance Note, the SEA process should include an assessment of the impacts 'for likely significant effects, including cumulative effects of climate change on environmental vulnerabilities' and 'Consider the latest climate change science and prediction and how these could relate to the significant effects of implementing the [Strategy]<sup>17</sup></p> <p>The Draft Environmental Report notes that mitigation measures are set out for limiting ammonia and GHG emissions as part of the Strategy and <i>'[t]herefore no consequent transboundary effect is predicted as a result</i></p>

<sup>16</sup> Dr Stephen Flood, NUIM for Stop Climate Chaos, Projected economic impacts of climate change on Irish agriculture <http://www.trocaire.ie/resources/policyandadvocacy/projected-economic-impacts-climate-change-irish-agriculture> ; EPA, Greenhouse Gases & Climate Change Factsheet, 2013

<sup>17</sup> 'Integrating Climate Change into Strategic Environmental Assessment in Ireland'



	<p><u>Agri-Food Strategy 2025.</u> There is insufficient information to assess whether such measures will be able to mitigate transboundary effects which would naturally stem from increasing emissions.</p> <p>The EPA has also recently noted that proposed emissions increases under Food Harvest 2020 would make limiting and reducing NH3 emissions problematic.<sup>18</sup> <u>It is unclear how the above comment purporting no transboundary effects can be reconciled with the EPA's conclusion.</u></p>
Do you agree with the assessment outcomes and potential impacts addressed?	<p>There is insufficient information and analysis to support the conclusion that the implementation of the draft Strategy is likely to have positive effects,</p> <p><u>Scoring System</u></p> <p>Regarding the traffic light system utilised the assessment of the strategy's actions is detailed in Table 4-1, it is not clear what 'significant/moderate positive', 'imperceptible/neutral', 'slight negative' etc. means in practice. The previous assessment in Food Harvest 2020 linked these scores to projected changes in emissions which allowed for some analysis of methodology employed. <u>The current general descriptions are inadequate for a thorough assessment.</u></p> <p>Regarding the additional information on the scoring of sustainability actions set out in tables in section 9, the conclusion that there are positive effects, in particular in terms of GHG emissions, is extremely difficult to interrogate and assess. For example, while <i>Placing sustainability as a goal of the production system</i> [Table 9.6] is supported, it is not clear when, how or to what extent this will result in reductions in GHG emissions. <u>In the absence of quantitative information, it is questionable whether such actions will result in an overall positive effect, i.e. actual total emissions reductions from the sector.</u></p> <p>This absence of information and lack of clarity in scoring puts conclusions made on the identification of significant effects in doubt. The following conclusions in Section 5.4 are particularly problematic. <i>'Actions within the draft Agri-Food Strategy 2025 in connection with policy development and recognition of agriculture's role in formulating energy policy have the potential to be significantly positive in relation to GHG emissions and moderately positive in relation to climate change. All other actions are deemed to moderately positive or imperceptible in relation to GHGs. As a result of uncertainty undefined growth opportunities are deemed to represent a slight moderate threat.'</i></p> <p>These points must be considered in view of the explanation in the Draft Environmental Report that <i>'[n]o new or novel mitigation measures are recommended'</i>. The Departmental background paper on 'Climate Change and</p>

<sup>18</sup> EPA, Ireland's Transboundary Gas Emissions 2013 April 1st 2015

	<p>Sustainability' noted '[t]he environmental impact of [Food Harvest 2020] was considered to be slightly negative overall prior to mitigation, and <u>by inference further negative impacts could be associated with increased production levels towards 2025, hence further mitigation will be required.</u>'<sup>19</sup> In light of the expansion proposed in the draft Strategy, the conclusions in section in 5.4 cannot be accepted given the absence of further measures and of sufficient information on their implementation and effect on emissions.</p> <p>It is also unclear how this conclusion aligns with the prior statement that positive impacts are limited to research, promoting the concept of sustainability and expanding forestry and that '<i>Increases in production arising from an expansion in livestock numbers will have a negative implication for GHG emissions.</i> It also contradicts the EPA's statement noted in the Natura report that '<i>it is unlikely that [sustainable intensification] will be able to deliver the emission reductions that are necessary if overall national emissions are to be lowered, and if Ireland is to meet its international obligations.</i>'</p> <p>- It is welcomed that the draft Draft Environmental Report recognises that <i>[s]ectoral expansion has potential for negative effects on water quality, biodiversity, soil quality, GHG emissions, waste generation, and landscape through intensification, change in land use, use of fertilisers, and increase in animal numbers.</i> However, there is insufficient information to conclude that '<i>...if [sectoral expansion] is combined with the actions in Chapter 4 then environmental effects should be reduced.</i>'</p>
<p>Do you agree with the list of mitigation measures and monitoring proposed? Are there any further measures you consider should be included?</p>	<p><u>Mitigation Measures</u></p> <p>- While some proposed actions noted in the Draft Environmental Report would seem to be generally beneficial for the environment, it is unclear whether and to what extent mitigation measures listed in Table 6-1 Mitigation Table [and Table 9.2] would '<u>prevent, reduce, and as fully as possible offset</u> any significant adverse effects on the environment of implementing the plan or programme' as required by Annex I of the SEA Directive.</p> <p>- It is similarly noted in the EPA's Guidance Document that '<i>Environmental decision-making, planning and investment needs to respond to the challenges posed by climate change</i>'. Due to the absence of quantitative information, <u>it is not clear how or whether the mitigation measures constitute an adequate response in terms of emissions reductions in line with 2050 objectives and international commitments.</u></p> <p>- Teagasc research as part of the environmental assessment of Food Harvest 2020 indicated that GHG emissions could only be reduced by 1.1 Mt or about 5 % based on mitigation measures.<sup>20</sup> The SEA should include an</p>

<sup>19</sup> Background paper on 'Climate Change and Sustainability' <http://www.agriculture.gov.ie/2025strategy/>

<sup>20</sup> Background paper on 'Climate Change and Sustainability' <http://www.agriculture.gov.ie/2025strategy/>

	<p>analysis of implementation and impact of these measures set out in the environmental analysis carried out for Food Harvest 2020.</p> <p>– In relation to the scoring of specific measures as ‘positive’ in terms of GHG emissions, further information is required on how measures will result in a direct and immediate reduction in emissions in the forecast period. Additional information is also needed on the implementation/uptake including indicative data on the potential emissions saving. This is true for a range of measures including:</p> <ul style="list-style-type: none"> <li>• Recognising agriculture’s role in ongoing National, EU and International Climate Change and Energy Policy Development.</li> <li>• Uptake of renewable energy technologies, energy efficiency actions and promotion of biomass. and</li> <li>• Uptake of environmental protection systems and increasing environmental awareness at SME level’</li> <li>• Roll out of the Carbon Navigator Initiative</li> <li>• Better genetic breeding in the dairy sector.</li> </ul> <p><u>Monitoring</u></p> <p>The monitoring section includes a list of negative environmental impacts associated with expansion under the draft Strategy: <i>‘Negative effects from use of fertilisers on water quality, species, and habitats. Increased GHG emissions from liming. Increased GHG emissions from increased livestock numbers. Negative effects on biodiversity and designated sites from land pressures and use of fertilisers, manures etc.’</i> [Table 7.1]</p> <p>It is agreed that a greatly enhanced monitoring mechanisms including annual reporting of GHG emissions analysis are necessary. These should be supported by robust accountability and compliance procedures. However, it is important to be clear that monitoring in itself is not a mitigation measure and such significant negative effects can only be prevented through a revision of negative actions under the draft Strategy.</p>
Are you aware of any further environmental information that will help to inform the environmental assessment findings?	
Do you have any other comments you wish to make on the Food Wise 2025 and/or the related SEA	<p>- The Strategy must also factor in all relevant costs based on the ‘polluter pays’ principle such that cost analyses reflect all costs of action or inaction. The Oireachtas Committee Report on the draft Climate Bill points to the significant additional compliance costs and fines (not counting damage costs) which would fall on the state should Ireland fail to achieve EU legislative objectives.<sup>21</sup></p>

<sup>21</sup> Joint Committee on the Environment, Culture and the Gaeltacht, Report on the Outline Heads of the Climate Action and Low Carbon Development Bill 2013, November 2013

Environmental Report and Natura Impact Statement?	
--	--