Economics and Planning Division,

Department of Agriculture, Food and the Marine,

Agriculture House,

Kildare Street,

Dublin 2.

8th May 2015

**Re: Consultation for Scoping of Environmental Report for Agri-Food Strategy 2025**

To whom it may concern,

The Irish Co-operative Organisation Society Ltd (ICOS) welcomes the opportunity to provide some brief observations on the scoping phase of the development of a Strategic Environment Assessment (SEA) of the Draft Agri-Food Strategy 2025.

The Issues Paper distributed to participants at the Scoping Workshop held on Thursday 9th of April 2015 states that "the greatest challenge to Agri Food Strategy 2025 will undoubtedly be the question of Greenhouse Gas (GHG) emissions.”[[1]](#footnote-1)

ICOS recognises that this is indeed a significant challenge and through its Co-operative members is willing to develop sustainable and lasting solutions. That said, the issue of greenhouse gas emissions and agriculture is both complex and multi-faceted.

A broad based approach to assessing the mitigation potential of the agriculture and wider land use sector is required within the SEA, consistent with the decision of the European Council conclusions from 23-24 October 2014.[[2]](#footnote-2)

The scope of the SEA when assessing the issue of greenhouse gas emissions and agriculture needs to recognise the limited mitigation potential within the overall agricultural sector. The Teagasc Marginal Abatement Cost Curve has identified 1.1 Mt CO2 abatement potential by 2020 and Teagasc has identified carbon neutrality has a long term objective[[3]](#footnote-3).

This is not to say that Irish agriculture will neglect its obligation in terms of reducing greenhouse gas emissions. Central to achieving the objective of carbon neutrality in the long term are significant efficiencies at farm level such as better breeding, more efficient fertilizer use and better grassland management and utilisation. The Common Agricultural Policy will also underpin these efforts through greening requirements, cross compliance with EU environmental legislation and rural development measures.

ICOS believes that a complete and holistic picture of the impact of agriculture on global warming in terms of contribution as well as mitigation is required. As such, the SEA must also examine within its scope, the carbon sequestration potential of the land use sector including forestry, peatland and permanent grassland.

The Issues Paper correctly points out that Ireland is among the most carbon efficient in the EU, in terms of agricultural production[[4]](#footnote-4). This position is supported by research carried out by the EU’s Joint Research Centre[[5]](#footnote-5) and the UN’s Food and Agriculture Organisation[[6]](#footnote-6). The SEA must also recognise the inherent threat of carbon leakage, whereby food production may be displaced to less environmentally efficient locations, if blunt and unsustainable policy instruments are proposed to deal with greenhouse gas emissions and agriculture.

Moreover, the evolving problem of global food security cannot be ignored with global population expected to rise to 9 billion by 2050 from 7 billion today according to the OECD. Ireland’s grass based milk, beef and lamb production systems have one of the lowest carbon footprints per kg of product produced and are ideally placed to address growing food demand as a global leader in environmentally sustainable food production.

The abolition of milk quotas on the 1st of April 2015 will allow the Irish dairy sector to reach its true economic potential. ICOS strongly supports the guiding principle that environmental protection and economic competitiveness can be both equal and complementary. The sustainable intensification of the Irish dairy sector over the coming years will be reinforced by the implementation of the Sustainable Dairy Assurance Scheme (SDAS), as part of the Origin Green initiative.

In conclusion, ICOS members are deeply committed to ensuring the highest environmental standards and comply with all relevant EU and national legislation concerning the environment, air quality, biodiversity, water and public health.

We look forward to engaging further with all stakeholders on these important matters, in advance of the publication of the SEA and the Draft Agri-Food Strategy 2025.

Yours sincerely,

Martin Keane,

President,

Irish Co-operative Organisation Society Ltd.

1. Agri-Food Strategy 2025, Strategic Environmental Assessment Issues Paper, Dr Ainhoa Gonzalez and Dr John Fry, 2nd April 2015, page 14. [↑](#footnote-ref-1)
2. European Council (23-24 October 2014) conclusions, paragraph 2.14. [↑](#footnote-ref-2)
3. Carbon Neutrality as a horizon point for Irish Agriculture: a qualitative appraisal of potential pathways to 2050, R.P.O. Schulte et al, Teagasc, December 2013. [↑](#footnote-ref-3)
4. Agri-Food Strategy 2025, Strategic Environmental Assessment Issues Paper, Dr Ainhoa Gonzalez and Dr John Fry, 2nd April 2015, page 14 [↑](#footnote-ref-4)
5. European Commission, Joint Research Centre (JRC), Evaluation of the livestock sector’s contribution to the EU greenhouse gas emissions, Final Report, 2010. [↑](#footnote-ref-5)
6. Food and Agriculture Organisation, Animal Production and Health Division, Greenhouse Gas Emissions from the Dairy Sector, A life cycle assessment, 2010. [↑](#footnote-ref-6)