



Environmental Pillar



Environmental Pillar Submission on the

*Environmental Analysis of Scenarios Related to
Implementation of Recommendations in Food
Harvest 2020 (FH2020)*

Consultation Response: July 2012

Contents

SUMMARY	3
THE STATUS OF FOOD HARVEST 2020	4
1. ASSESSMENT OF THE ENVIRONMENTAL IMPACTS OF FOOD HARVEST 2020	5
2. LIKELY ENVIRONMENTAL IMPACTS OF FOOD HARVEST 2020	7
2.1 SURFACE FRESHWATERS, GROUND WATERS AND COASTAL AND ESTUARINE WATERS	8
2.2 SOILS.....	8
2.3 BIODIVERSITY	8
2.4 CLIMATE CHANGE	9
2.5 LANDSCAPE.....	10
2.6 CLIMATIC FACTORS INCLUDING IMPACTS OF GREENHOUSE GAS EMISSIONS	11
3 SECTORAL SPECIFIC IMPACTS	12
3.1 BEEF	12
3.2 SEAFOOD	12
3.3 FORESTRY & BIO ENERGY CROPS	14

The Environmental Pillar is a national Social Partner established by Government decision in 2009. It is an advocacy coalition of 27 national environmental NGOs.

Environmental Pillar members: An Taisce. Bat Conservation Ireland, BirdWatch Ireland. CELT - Centre for Ecological Living and Training. Coast Watch. Coomhola Salmon Trust. Crann. ECO UNESCO. Feasta. Forest Friends. Friends of the Earth. Global Action Plan Ireland, Gluaiseacht. Grian. Hedge Laying Association of Ireland. Irish Doctors Environment Association. Irish Natural Forestry Foundation. Irish Peatland Conservation Council. Irish Seal Sanctuary. Irish Seed Saver Association. Irish Whale and Dolphin Group. Irish Wildlife Trust. The Organic Centre. Sonairte. Sustainable Ireland Cooperative. VOICE. Zero Waste Alliance Ireland

Whilst this document was developed through the processes of the Environmental Pillar it does not necessarily represent the policies of all its members.

Summary

- Food Harvest 2020, as a Government Strategic Policy Document should have been subjected to a screening under Article 6 of the Habitats Directive. This would have inevitably resulted in the need to conduct a number of Appropriate Assessments (AA).
- During the development of Food Harvest 2020, as a Government Strategic Policy Document a Strategic Environmental Assessment (SEA) should have been conducted as required by the SEA Directive.
- The current process of, *Environmental Analysis of Scenarios Related to Implementation of Recommendations in Food Harvest 2020 (FH2020)*, does not fulfil the obligations of government under either of these legally binding EU Directives.
- FH2020 will impact on at least 75% of the land and most of the surface, estuarine and coastal waters of this state.
- Apart from the impacts on sites protected under EU and domestic law, this Government Strategic Policy Document has the potential to impact on all aspects of the biological systems that maintain the productivity of agriculture. In particular intensification will provide even greater incentives for the on-going destruction of many small but important pockets of biodiversity for example in hedgerows, scrubland and wetlands.
- FH2020 will also increase Green House Gas emissions with consequent climatic, environmental, health and economic consequences both domestically and globally.
- Adaptation and resilience to climate change need to be considered in the assessment of both the implementation of the Strategy, and analysis of its impacts.
- The absence of clear targets, with the exception of the dairy sector, makes a full analysis very difficult.
- Similarly, the absence of good data, in particular regarding soils and coastal biodiversity makes analysis and consequent decisions not much more than guess work.
- The desire to increase employment and farm incomes in the short-term should not be done at the cost of destroying the fundamental wealth that supports all human activity for this and future generations. This wealth is our clean seas, freshwater, stable atmosphere, good quality soils, and a healthy biodiversity.
- The greening of agriculture is the great hope for Irish farming if we are to retain our brand as the unpolluted Green Ireland. Value added to primary production should be the first step in improving income from agriculture, coupled with a serious drive towards high nature value farming practice that makes the produce more attractive to the premium markets.
- The development and implementation of this Government Strategic Policy without the serious look at how it impacts on the long-term well-being of the country is both illegal and irresponsible.

The Status of Food Harvest 2020

While there has been some confusion as to the nature and status of the document, it is clear that **Food Harvest 2020 is a national strategic policy** coordinated by the Department of Agriculture, with the assistance of the following state bodies: Enterprise Ireland; the Environmental Protection Agency; Bord Bia; Teagasc and Bord Iascaigh Mhara. The implementation of the plan is coordinated by a High level Implementation Group Chaired by the Minister for Agriculture and with its Secretariat provided by the Minister's Department, and includes two of his top officials. All of this is less than surprising in the light of a written response to a parliamentary question on 1st December 2010 by the then Minister of Agriculture Fisheries and Food Mr Brendan Smith TD, when he said "The Government's strategic policy document, Food Harvest 2020, outlines the vision for the expansion of the agri-food and fishing sector, the actions to be taken, and the targets to be achieved. Following its publication in July this year, my primary focus has been directed at ensuring a coherent and integrated approach to its implementation."

1. Assessment of the Environmental Impacts of Food Harvest 2020

Food Harvest 2020 is in breach of the EU Habitats Directive¹ (and Ireland's transposing Regulations) because the Government ought to have screened for the need for an Appropriate Assessment of the plan in advance of its adoption. This screening exercise would have involved determining whether significant effects on a Natura 2000 site (or sites) can be excluded in implementing the Food Harvest 2020 recommendations (see the judgment of the European Court of Justice in Case C-127/02 Waddenzee). If such effects could not be so excluded - as is evidently the case here - an appropriate assessment would be required; again, in advance of the plan being adopted. The Government can only agree to the plan or project after having ascertained that it will not adversely affect the integrity of the site(s) concerned.

As Food Harvest 2020 is a plan or project not directly connected with or necessary to the management of the site(s) but likely to have a significant effect thereon, an appropriate assessment must be carried out before it is adopted or implemented.

The Environmental Pillar asserts that a Strategic Environmental Assessment (SEA) of Food Harvest 2020 is required under Articles 2 and 3 of Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment and should be carried out as soon as possible. This view was also expressed by Micheal Lehane of the EPA.²

The authors of Food Harvest 2020 themselves recommended that their proposals should be subject to a Strategic Environmental Assessment, and the Government chose to ignore this recommendation.

¹ Article 6.3 Habitats Directive

Any plan or project likely to have a significant effect on a Natura 2000, either individually or in combination with other plans or projects, shall undergo an Appropriate Assessment to determine its implications for the site. The competent authorities can only agree to the plan or project after having ascertained that it will not adversely affect the integrity of the site concerned.

² Opening address at the EPA "State of the Environment" Conference, 27th June 2012

Under Article 7 of Directive 2001/42/EC the transboundary effects must also be assessed in cooperation with the neighbouring state. This is of particular importance if we look at the potential of pollution of the large area of transboundary waterways including SACs and Margaritifera sites in the Foyle catchment.

The current process of, *Environmental Analysis of Scenarios Related to Implementation of Recommendations in Food Harvest 2020 (FH2020)*, does not fulfil the obligations of government under either of these Directives.

The Environmental Pillar is not clear what exactly is being consulted on at this stage. An SEA process requires early public participation in the assessment process and in the final decision-making process. In this instance, there is no report and consultation is being carried out on a finalised FH2020 document which lacks much of the information necessary to enable informed comment on the environmental implications of the strategy already adopted.

Is it proposed that the environmental report when produced will be subject to consultation?

Is it proposed that FH2020 will be revised to take into account the findings of the environmental analysis?

2. Likely Environmental Impacts of Food Harvest 2020

A clear science-based definition of really sustainable agricultural production in an Irish context is badly needed.

It is noted at the outset that almost all that envisaged “growth” is based on feedstuff produced wherever in the world with, in many cases, negative impact on their local economies, not to forget the consequences for the environment, locally and globally.

The environmental impact of transporting the additional hundreds of thousands of tons of feedstuffs around the globe should also be measured.

It is difficult to give exact reactions to FH2020 where the strategy itself does not give clear volume targets except in the case of milk production.

- The dairy output target to see a 50% increase in milk production by 2020 relative to the average volume of production over the period 2007-2009.
- No volume target is set for beef or sheep production, rather a target of increasing the output *value* from each of these sectors by 20% by 2020 (set relative to the average of the period 2007-2009).
- The pig sector the target is to increase output value by 50% by 2020.
- Targets for forestry and bioenergy crops are not specified.

If FH2020 is talking about increasing value rather than production, then there may be huge opportunities for environmental benefit through environmentally-friendly labelling, etc. for example, Glanbia has a “sustainability” programme, and recently got a large European contract which, it claimed, was due to this.

However a national strategic policy that concerns activities with such obvious environmental impacts as agriculture and which promotes an increase in these activities across c.75% of the land surface and most of the coastal zone of Ireland is inevitably going to impact on:

2.1 Surface Freshwaters, Ground Waters and Coastal and Estuarine Waters

The issue in relation to the impact of FH2020 on water quality in the context of Ireland's Water Framework Directive obligations was recently clearly summarised by the ESRI³:

“Water Quality: Nutrient enrichment of surface and ground waters is prevalent in many locations and agriculture is one of the contributory sources. With increased volumes of excreted nutrients associated with growth in the sector, Food Harvest 2020 has the potential to exacerbate the problem. As instances of poor water quality already occur with current levels of output, it is difficult to argue that existing nutrient management practices are adequate to protect the environment from further harm (or return water quality to a ‘good’ status as required under the Water Framework Directive).”

2.2 Soils

The absence of good data on Irish soils must be serious concern and one that needs to be addressed as part of an SEA. Our soils are irreplaceable resources and yet there is scant regard paid to them. To make any kind of analysis of the long-term impacts of FH2020 without an understanding of the impacts of this Government Strategy would be folly of the highest order.

2.3 Biodiversity

Increasing outputs described in the Food Harvest 2020 will likely have a very significant range of impacts on biodiversity in Ireland, including both species and habitat types that are protected as annexed in the Birds and Habitats Directives, as well as biodiversity in the wider farmed landscape.

Extensive grasslands also tend to have many more species of seed producing grasses as well as broadleaved plants in the sward all of which support a wider variety of invertebrates and more

³ http://www.esri.ie/publications/search_for_a_publication/search_results/view/index.xml?id=3549

diversity of birds. They support ground nesting birds, many of which have been facing severe declines in recent decades because of intensification of land management. Semi-natural grasslands that remain in Ireland are threatened either by the abandonment of all management, which for most grassland areas results in reversion to scrub, or by the intensification of management. A range of support is needed for the conservation of semi-natural grasslands in Ireland. Food Harvest 2020 targets will run counter to this need by promoting and incentivising intensification. Intensification through ploughing, reseeded, fertiliser application and soil compaction from increasing mechanisation can also reduce the ability of land to attenuate flooding and will often increase pressure on water quality due to higher fertiliser inputs and more sediment runoff from land. More intensively managed grasslands externalise their environmental costs, producing cheaper commodities, but at the expense of society.

Areas of scrub and rocky outcrops are important for biodiversity, and should be protected under the harvest 2020 programme. Brown long eared bats, Whiskered bats and Natterer's bats all preferentially select maternity roosts adjacent to scrub. All these bats are Annex IV species and their roosts are protected under the Habitats Directive. Bats have been found roosting in stone and scree. Stony and rocky areas also provide basking areas for species such as butterflies, newts and lizards. These sensitive areas must be protected from clearance.

2.4 Climate Change

There are significant greenhouse gas emissions increases associated with meeting the targets laid out in Food Harvest 2020 - according to Teagasc: 'under a Food Harvest 2020 scenario, the historical downward trend in agricultural GHG emissions is projected to reverse due to the growth in economic activity in this sector'. In the absence of abatement measures, by 2020 emissions are projected to increase by c. 7% compared to the 2010 level.⁴ While this increase incorporates ongoing gains in production efficiency and improvements in the carbon efficiency (GHG emissions per unit produced) of agricultural production the net increase in emissions will greatly impede Ireland's ability to meet the greenhouse gas emissions reduction targets for 2020 and later. We are currently not on track to

⁴ A Marginal Abatement Cost Curve for Irish Agriculture-Teagasc submission to the National Climate Policy Development Consultation

meet our 2020 targets even though we are legally and morally obliged to do so. Fundamental policy choices have to be made in the National Climate Change Strategy and Food Harvest 2020 is apparently attempting to pre-empt those choices. We need to assess what alternative means to adding value might be exploited as well as assess wider policy implications of the abatement options referred in Teagasc's work.

The Environmental Pillar also raises serious concern that there can be significant environmental damage and habitat loss associated with afforestation of marginal grassland habitats, including exacerbating losses of species rich and annexed grassland habitats, exacerbated decline of farmland bird species, already an issue of national concern, and impacts on water quality through associated drainage and nutrient inputs from afforestation. Current regulation of the forest industry and forest policy does not account for this or provide sufficient action to address these problems. The degree of environmental impact and benefit is dependent on the type of afforestation, and several studies in the UK and from further afield demonstrate that continuous cover mixed forestry has far greater carbon storage and sequestration potential than clear fell silvicultural systems

Much greater carbon benefits as well as biodiversity benefits would be achieved if protection and restoration of peat bogs were pursued through agricultural policies and measures, including by implementing the recommendations in this regard in the EPA-funded BOGLAND study.

Implementation of the Common Agricultural Policy in other countries specifically addresses peatland protection, management and restoration; the same should be the case here.

2.5 Landscape

The Irish landscape is dotted with many small patches of land with importance for biodiversity, for example, wetlands or scrub. These are likely to be under threat from intensification, at a time when Ireland is required to halt the decline in Biodiversity.

At the same time and conversely, abandonment of agriculturally non-productive land is likely to become an issue with FH2020 focussing entirely on productive farming, with social and environmental consequences.

2.6 Climatic factors including impacts of greenhouse gas emissions

The impact of Climate Change specifically in Ireland must be factored into any environmental assessment. As the impacts of 2 to 3 times (depending on location) the normal rainfall in June 2012 are counted it becomes clear that farmers may well be relying on imported grain and pulses to supplement poor harvests in order to maintain existing stock numbers this year. If this trend worsens then the environmental footprint of Irish agriculture will grow dramatically.

Similarly the likely impacts on waters of fertiliser use in changed climatic circumstances must be factored in, whether from FYM or artificial sources.

3 Sectoral Specific Impacts

The focus on increasing dairy production with its consequent GHG and other impacts is even more apparent in Food Harvest 2020 Milestones for Success, than in the original FH2020 document.

3.1 Beef

Part of the beef target is to slaughter, process and package more beef in Ireland for export at a higher value. However, the Food Harvest 2020 report does again not address whether the facilities to carry out the slaughter, processing and packaging of the beef are adequate in Ireland or would new facilities be needed. If increased slaughtering facilities are required they have high associated levels of water and the energy consumption associated with them. In addition, the waste associated with increased carcase production has also not been accounted for. The report foresees a decrease in the GHG emissions from this sector (section 4.1 page 38), however it does not appear to have addressed GHG emissions associated with increased incineration, transport and associated increases in energy use.

3.2 Seafood

EU Commissioner for the Marine, Ms Damanaki, ICES and Marine Institute have all noted that 75% of stocks have been overfished i.e. catches above Maximum Sustainable Yields (MSY).

Many Irish stocks are seriously data deficient and few have long term management plans. Irish Total Allowable Catches (TACs) and quotas are in decline or in early recovery mode.

The EU's Common Fisheries Policy (CFP) has failed to achieve social, economic or environmental sustainability within the European fishing industry since initiation in 1983⁵. Irish landings of many important commercial stocks have substantially declined and a number of stocks are considered severely depleted. In addition, 42 per cent of stocks for which scientific reference points in relation to Maximum Sustainable Yield (MSY) are known, are currently being overfished⁶. Despite this a

⁵ [EC, 2009](#); [Khalilian et al., 2010](#); [EC, 2011a](#)

⁶ [Marine Institute, 2011a](#)

fundamental reform could, in time, deliver a healthier marine environment with viable dependent communities i.e. more fish and more fishing.

Maximum Sustainable Yield (MSY) is an intermediate target to achieving healthy abundance levels. Longer-term fisheries management objectives must be developed that are more conservative and precautionary. Thus, the aim should be to reach sustainable levels of fish stocks within Irish waters by 2015, without exception. To this end, fishing effort must be reduced for those fisheries which are not yet sustainable in relation to MSY in order to achieve F_{MSY} by 2015. Defaulting to achieving F_{MSY} by 2015 only 'where possible' is, will jeopardises the future viability of dependent fishing communities. Rebuilding stocks to sustainable levels through immediate and sufficient efforts will provide the maximum opportunity for full stock recovery and the quickest path to increased economic returns⁷.

MSY is essentially an economic concept for achieving maximum long-term production from fisheries, where higher profits can be made through reducing fishing effort below scientifically calculated limits⁸. The European Commission has predicted that if appropriate management decisions are made, overall stock sizes and catches could increase by, circa, 70 per cent and 17 per cent respectively, and the gross value-added for the entire EU catching industry could rise from current levels by almost 90 per cent⁹.

Aquaculture ventures must not be initiated unless it can be proven that surrounding marine habitats and wild species will not be negatively affected. In addition, in the interest of globally responsible seafood production, the development of aquaculture for low trophic level species should be encouraged and it is imperative that efforts are made to reduce the fish-in-fish-out ratio in feed for high trophic level species¹⁰. The present aquaculture development in Ireland amounts to little more than the globalisation of overfishing – it undermines what should be a valuable wild Irish salmon fishery while contributing to the depletion of valuable fish (and krill) stocks globally.

⁷ [EC, 2011b](#)

⁸ [Larkin, 1977](#); [Grafton et al., 2006](#)

⁹ [EC, 2011b](#)

¹⁰ [Naylor et al., 2000](#)

Recent research has highlighted the dangers of ill-placed fish farms to native salmon and trout. An SEA would require consideration of alternatives such as contained systems and 'hatch and catch'.

A recent report, *Jobs Lost At Sea*,¹¹ found that if the fish stocks studied were fished at MSY levels (i.e. historical levels) they could provide 28,420 tonnes per year. Currently, catches from these stocks are only 45 percent of this: 12,670 tonnes. Rebuilding just these stocks could provide for 740,000 Irish people's annual fish consumption. This could double revenue, from €13 million caught, to the MSY level of €23 million every year. Employment in the fishing industry could increase by 5 per cent (fishermen and processors).

A future European Maritime and Fisheries Fund¹² should promote sustainability such as measures to support biodiversity and the elimination of monies for port construction and engine replacement. The Irish fishing industry currently appears to be suffering substantial fleet overcapacity which has been built up through the provision of subsidies¹³. Fleet overcapacity and the subsidies that maintain or encourage overcapacity have been recognised as drivers of overfishing both within EU waters and globally¹⁴. No financial aid should contribute to the maintenance of existing overcapacity and ask that Ireland reports accurately on the balance between capacity and available resources.

Selectivity, sustainability, quality, value added, improvement in the sea/seashore employment ratio, zero discarding, with full use of the total catch is the only workable scenario for Irish fishing. Opportunities for increased volume output are limited and value added is the preferred option for sustainable and recovering stocks.

3.3 Forestry & Bio Energy Crops

Ireland is still operating under the 1996 Forest Policy. This business plan was based on double today's planting rates. The current programme for government states that planting rates will be at 17,500 hectares per year. The current forestry plan needs a full SEA on its own.

¹¹ [nef, 2012](#)

¹² [EC, 2011c](#)

¹³ [EC, 2011d](#)

¹⁴ [Munro and Sumaila, 2002; Pauly et al., 2002; Jacquet et al., 2009](#)

The 1996 Policy did not anticipate the increased demand for species diversity, the expansion of wood fuel sector, and carbon accounting. The 75% European funding was withdrawn because of environmental issues in 2007 and if reprogrammed could save Ireland more than €40m a year.

Native scrub is being cleared rapidly to increase “productive acreage” in order to qualify for CAP funding. It could be protected by switching the land from CAP to existing forestry premiums. This would restore semi-natural forests, with no requirement for establishment grants.

Agroforestry is now recognised worldwide as a way to increase overall yield by planting selected trees in a permaculture-related design. Apart from fruit, nuts, timber and non-timber products, the trees provide shelter, shade, improved soil fertility, soil stabilisation, flood attenuation, enhanced biodiversity (including pollinating and predatory insects) and carbon sequestration. Ireland has huge potential to develop agroforestry systems and investment in pilot projects now could bring long-term economic, social and environmental benefits.

As the FH2020 proposes to massively increase the volume of farm produced effluent by 2020, the question arises whether there is sufficient buffering of surface waters, through tree cover and wetland systems, of the existing output. Effective development of wetland/treecover riparian buffers will be essential in this regard.

Contact information:

For further details please contact Michael Ewing, Coordinator.

Postal Address: Environmental Pillar, Tullyval, Knockvicar, Boyle,
Co Roscommon

Telephone: 00353 (0)71 9667373

Mobile: 00353 (0)86 8672153

Environmental Pillar Submission on *Environmental Analysis of Scenarios Related to Implementation of Recommendations in Food Harvest 2020 (FH2020)*

Email: michael@environmentalpillar.ie

Website: www.environmentalpillar.ie