Submission To

Public Consultation on the Draft Strategic Environmental Assessment Scoping Report for the Agri-Food Strategy 2030

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1.0 Introduction

Beet Ireland welcomes the opportunity to make a submission at this stage of the Strategic Environmental Assessment in the context of the development of a new Agri-Food Strategy 2030. It is noted that the SEA Scoping Report provides a comprehensive backdrop to the current policy framework and it highlights significant challenges currently facing the industry. This backdrop must also be considered in the context of the recent Government Programme for Government, Our Shared Future which seeks "*action that can deliver a better quality of life for all, equality within society and a deeper sense of connection to the natural world around us, and each other*." This Government Programme document goes on to state that "*This Government will put sustainability at the heart of our fiscal, enterprise, innovation, and environmental policies. We see this recovery as an opportunity to embed structural shifts that will benefit our economy and people through the adoption of technology and innovation and the pursuit of climate resilience, both sectorally and nationally*." The Programme commits to a Climate Action Bill as follows:
"We are committed to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) and to achieving net zero emissions by 2050. The 2050 target will be set in law by the Climate Action Bill, which will be introduced in the Dáil within the first 100 days of government, alongside a newly established Climate Action Council. The Bill will define how five-year carbon budgets will be set. Every sector will contribute to meeting this target by implementing policy changes, as outlined throughout this Programme for Government. The special economic and social role of agriculture and the distinct characteristics of biogenic methane, as described by the Intergovernmental Panel on Climate Change, will be fully recognised in plans to achieve these targets."

The current consultation of the SEA is therefore very timely and represents an important stepping stone in the development of a new Agri-Food policy for Ireland.

2.0 Committee Approach

The SEA Scoping document notes that:
"The Committee has agreed to adopt a 'Food Systems' approach in the development of the strategy and its deliberations so far have centred around four thematic areas, namely:
1) Future food and beverages that meet consumer and societal expectations.
2) Primary producer viability and well-being.
3) An innovative, competitive Agri-Food sector driven by technology and talent.
4) A climate smart, environmentally sustainable agri-food sector."

These themes are all critically important for the future of the agri-food industry in Ireland. The challenge ahead is how these themes are aligned against the objectives set out in current Government policy and the SEA objectives.

3.0 Horticulture

It is noted that horticulture is referenced once in the document, in Appendix A. This is a serious oversight and must be addressed in the next stages of policy development. The sectors relating to mushrooms, potatoes, vegetables, protected crops and amenity production play an important role in the agri-food industry however they have been ignored in the SEA Scoping document.

4.0 Baseline Data

The chapter detailing baseline data, provides a comprehensive backdrop to the industry current status vis a vis:
3.1 The Current State of Ireland's Environment
3.2 Ecology and Nature Conservation
3.3 Socio-Economics
3.4 Health and Quality of Life

3.5 Soil and Land Use
3.6 Water
3.7 Air Quality
3.8 Climate Change
3.9 Material Assets
3.10 Cultural Heritage
3.11 Landscape
3.12 Natural Capital
3.13 Key Environmental and Sustainability Issues and Likely Future Trends
3.14 Information Gaps

This chapter outlines the many pressures that the agricultural sector is currently facing e.g.

1. *identified as a key contributors to the declines in conservation status*
2. *inappropriate drainage and inappropriate herbicide and pesticide use are also contributing to the deterioration of habitats*
3. *pressures and threats on different bird groups*
4. *Agricultural intensification is acknowledged as a contributor to localised water quality issues*
5. *The environmental quality standard for total phosphorus is 0.025 mg/l P, meaning almost a third of lakes failed to meet the standard*
6. *Transitional water bodies are the worst performing type of water body with only 38% in good or high ecological status*
7. *Agriculture covers almost 70% of the land area of Ireland and diffuse pollution from agriculture is the most frequently observed significant pressure on water bodies*
8. *Modelled ammonia emissions are estimated to have increased by approximately 7.9% between 1990 and 2018*

The analysis goes on to link the worsening pollution metrics with the expansion of the beef and dairy sector when it notes that *"the implementation of Food Harvest 2020, Foodwise 2025 and the removal of milk quotas, has resulted in an expansion of the Irish agriculture sector in terms of area under management and number of livestock units. There has been an increase in dairy numbers of 27% between 2013 and 2018 as well as an increase of 37% in synthetic fertiliser use (EPA, 2020)"*

The analysis highlights the same issue with regard to Climate Change when it notes that "*the increase in agricultural output envisaged in FoodWise 2025 will provide a significant challenge for Ireland in meeting future emissions targets, reiterating the idea that any future expansion of output will have to be carried out whilst maintaining environmental sustainability; particularly as agriculture comprises one-third of national emissions and 44% of the non-Emission Trading Sectors (non-ETS)"*

Under the heading Material Assets it is noted that:
"There has been an increase in number/capacity of anaerobic digestion (AD) facilities and segregated food waste at recycling centres. There was an increase in the quantity of waste accepted for treatment at composting and AD plants of 11% (EPA, 2016). This waste is being turned into biofuels which is helping to reduce the use of fossil fuels therefore helping to reduce GHG emissions. Approximately 500,000 tonnes of animal by products are produced in Ireland per annum which generates approximately 27,000 tonnes of biofuel. An increase in agricultural production will generate additional waste products however Ireland is well placed to accept and re-use this waste. This in turn will lead to an increase in the availability of sustainable fuels across Ireland. An increase in fuel security will help underpin economic growth and further development in the agri-food industry (Department of Communications, Climate Action and Environment (DCCAE), 2014)."

In the context of the above it is noted that while there has been some increase in the number of AD facilities in Ireland since 2014, the opportunities that exist for increasing the level of AD adoption in the agri-food sector has not been underpinned by appropriate Government policies. Accordingly Ireland has not seen the widespread adoption of AD technologies in the agricultural sector and this remains a lost opportunity.

It is noted that a significant bioethanol production opportunity if the Government and fuel industry move from E5 to E10. The proposed biofuels blending obligation of 11% from January 2020 is simply a recognition of the status quo for today's biofuels deployment in Ireland, i.e. 5% real use of ethanol in petrol plus 7% real biodiesel, which is reported as 14% under double counting. This is not an appropriate policy to bring about significant environmental benefits. A 12% obligation from 2020, instead of 11%, would bring E10 petrol into the system.

5.0 Objectives

Chapter 4 details the objectives of the SEA which are aligned with the baseline data headings noted above. The Climate change and Material assets objectives are set out below:

Objective 7. Climate Change – Support national objectives to cut absolute greenhouse gas emissions and adapt to its predicted effects
Sub-objectives

a. Support the agri-food sector in reducing its GHG footprint per unit of output,
b. Improve the climate change resilience and adaption capacity of the sector,
c. Support land management practices that protect and capture carbon, particularly from peatlands and forests.

Objective 8. Material Assets – Conserve natural resources and reduce waste production
Sub-objectives

a. Safeguard natural resources (including minerals, forestry and peatland) and minimise unsustainable use,
b. Increase recycling rates and re-use of materials.

6.0 Alternatives

Chapter 5 considers the alternative strategies that could be considered in the context of the EPA RESEARCH REPORT NO. 157, "Developing and Assessing Alternatives in Strategic Environmental Assessment". This report recommends the following when considering alternatives:

"Use alternatives to present different ways of dealing with significant environmental issues/problems identified during scoping or ways of achieving a specific plan/programme objective or scenario (i.e. an image of the future). When based on scoping issues, use available good-quality and up-to-date baseline data, taking into account current knowledge. When based on objectives or scenarios, back-casting (i.e. setting a limited number of relevant, long-term objectives and working backwards to identify plan/programme measures that work towards such objectives) may be useful before identifying alternatives."

The SEA Draft Scoping document states that:
"The public consultation indicates a clear support for the 2030 Strategy to place an increased emphasis on environmental sustainability, particularly climate change resilience and protection of biodiversity and water quality. However, some support was also expressed for continuation of the 2025 Food Wise priorities either in full or part.
In this context; the reasonable alternatives to be considered by the SEA are proposed as follows. These are still under review by the 2030 Strategy Committee so may be subject to change."

The above illustrates a flawed assumption in terms of Foodwise 2025. It is clear from the current Government Programme and Climate Change policy documents and the baseline data outlined in the scoping document that any Strategic Environmental Assessment must place an increased emphasis on environmental sustainability. However the assumption that "*the continuation of the 2025 Food Wise priorities either in full or part*" is seriously flawed, when considered against the baseline data. As noted above the impact of key elements of the Food Wise 2025 is causing serious negative

environmental problems. It is therefore not reasonable to conclude that the proposed base case is appropriate i.e.

"Alternative 1: Base Case
The base case is assumed to comprise continuation of the 2025 Food Wise priorities unedited into the 2030 Strategy."

Alternative 3 goes on to suggest that increasing output beyond the 2025 Food Wise targets is a possible alternative i.e.

Alternative 3: Greater Emphasis on Production and Value
Alternative 3 assumes that the focus of the strategy be skewed more heavily towards increased production and output compared to 2025 Food Wise.

It is clear from the above that neither Alternative 1 or Alternative 3 are appropriate for the next stages of the SEA analysis. It is further noted that these 2 alternatives are not in keeping with the EPA Recommended Guidelines for Alternative Assessments.

Alternative 2 seeks to consider this option in comparison with 2025 Food Wise as the baseline case. The development of Alternatives with 2025 Food Wise as the base case is seriously flawed.

It is therefore recommended that alternatives be considered in the context of the 2030 and 2050 climate change targets that the current Government has signed up to. In this context it is suggested the following alternative scenarios be considered:

1. Alternative Base Case
    a. Use the year 2020 as the current base case and reference year to define current status of industry.
2. Alternative Sustainable Approach
    a. Assume the 2030 Government climate change and biodiversity targets as the benchmark to be achieved and outline the range of policies required to meet these targets.
3. Alternative Sectoral Approach
    a. Taking a sectoral approach to the agri-food industry, define the role as well as challenges and opportunities facing the creation of "A climate smart, environmentally sustainable agri-food sector"
4. Alternative Material Assets Approach
    a. Taking a land & sea use and material assets approach, define how Ireland can take a 2050 horizon timeline which will ensure that the agri-food sector is aligned with Government Programme to "sustainability at the heart of our fiscal, enterprise, innovation, and environmental policies."

7.0 Conclusions

The current Government policy framework is clearly focused on environmental issues and has committed to embedding 2050 climate targets in law with a Climate Action Bill within the first 100 days of Government. The current scoping exercise must be guided by this Government priority.

The framing of the current scoping exercise will define the direction of the final SEA and this will play an important role in guiding the future 2030 Agri-Food policies. Insufficient consideration was given to the 2025 Food Wise SEA analysis and this resulted in significant conflicts between production expansion and environmental impacts. The current SEA scoping analysis is therefore very important.

All sectors of the industry must be taken into scope for the SEA and the horticultural industry is noted in this regard.

The baseline data analysis provides an important reference point in the current year 2020. This brings a clear focus to the impact of agri-food policies over recent years and will inform the discussion going forward.

The use of 2025 Food Wise as a base case scenario is seriously flawed. In this context the section 6.0 above suggests a different approach to the definition of “Alternatives” in the current draft scoping document.