# ICMSA Submission to the Public Consultation on draft Scoping Report for the Environmental Assessment of Ireland's CAP Strategic Plan 2023-2027

April 2021

**SEA SCOPING REPORT OF DRAFT COMMON AGRICULTURAL POLICY STRATEGIC PLAN 2023-2027**

Under Directive 2001/42/EC - Assessment of Effects of Certain Plans and Programmes on the Environment, certain plans and programmes require an environmental assessment. This is known as the Strategic Environmental Assessment (SEA) Directive.

Article 1 of this Directive states that its objective is: 'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.'

**Areas outlined in the Scoping Report for the Environmental Assessment of Ireland's CAP Strategic Plan 2023-2027 include:**

- Biodiversity Flora and Fauna
- Climatic Factors (Climate Change & Air Quality)
- Water Resources
- Population and human health
- Soil and Geology
- Landscape
- Cultural Heritage
- Material Assets
- Ecosystem services/ and Natural capital

The scoping document asks if the CAP Strategic Plan will protect many areas of the rural economy, environment, and cultural aspects. Are there other plans or programmes that should be identified and reviewed as part of the Strategic Environmental Assessment process?

ICMSA has considered the document and have fed into feedback through breakout sessions in the recent CAP Consultative Committee meetings specially convened for this topic. Further to this, our Submission focused on the five questions that are outlined in the consultation document.

- **Are there other plans or programmes that should be identified and reviewed as part of the Strategic Environmental Assessment process? Is there additional information that needs to be considered as part of the baseline data?**
    - There are currently over 80 reports considered as part of the baseline data, but ICMSA believes that there are others that should be considered and could form potentially useful data on current farming practices. Omissions include farm economic reports and data such as National Farm Survey reports from Teagasc or FAPRI Ireland projections of farm data on economic and environmental baselines that will give representative data to form a truer picture of current farming conditions. There is also a lack of reports on the impact of Brexit on agriculture, rural economy, and North South cooperation when it comes to dealing with all island initiatives. The report needs to consider the three pillars of sustainability and the interaction between the three pillars.

- **Do you consider that the range of issues covered is appropriate?**
    - There are a wide range of topics covered as one would expect for a scoping exercise. However, ICMSA believes that there should be more focus on some of the potential positive impacts of agriculture on issues such as potential benefits of renewable energies in the bioeconomy and potential for the rural economy.
    - The use of "potential positive effect" in each of the topics but the definitive "negative effect" is disconcerting. This shows a somewhat bias approach whereby there is a definite negative effect but there only be a possible positive effect, this needs to be amended.
    - The report also needs to consider the economic and social impact on possible environmental measures under the CSP.
- **Are there any changes that in your consideration should be made a) to the proposed environmental objectives and b) to the guide questions including the consideration of alternatives?**
    - From an environmental scoping exercise, the objective is wide ranging and encompassing. On page 33, it is noted that there should be encouragement of the uptake of biodiversity measures. ICMSA believes that farmers should be rewarded for current features and

biodiversity already on their farms. Maintenance should be encouraged alongside the promotion of uptake as many farmers are currently practicing biodiversity standards that are exceptional and should be encouraged to keep doing such work. The overall theme of the document is one of sustainability opportunity costs between the three pillars – social, economic, and environmental. There may not be a pareto efficient outcome, in fact there will not be one, but we can achieve marginal gains in all, that would be a good steppingstone. Therefore, ICMSA believes that the questions on the economic sustainability of agriculture are missing in large swathes of the document.

  - Given the focus on environmental sustainability in many of the more recent policy documents: Ag-Climatise, Climate Bill, etc, it is important that the national and European objectives recognise and address the impact on the farmer. Objectives and measures should be of minimal cost to the farmer and any action that impacts on their income or progression should be properly compensated. There is a need for consistency and efficiency in how these objectives are translated into measures and actions for farmers, we need to maximise the benefits from actions across multiple SEA topics and other policy documents.
  - The considerations of objectives and alternatives needs to remember sustainability has three pillars and if the focus is only on environment, overall sustainability of the policy and its objectives is unfeasible.

- **Do you have further suggestions regarding the scope of the Strategic Environmental Assessment and its proposed assessment of the CAP Strategic Plan?**
  - There have been numerous goals set out in recent months for CAP 2023-2027 along with several climatic action goals. If the sector wants to achieve climate neutrality and become sustainable long term, the economic sustainability of policy measures needs to be fully evaluated to ensure the viability. If farmers are forced to change their systems and it then becomes unviable, we will damage the rural economy and could damage the credibility of policy going forward.

Economic impact needs to be investigated alongside the environmental impact reports.