IFA Submission on the draft scoping report for the environmental assessment of the CAP Strategic Plan 2023

Introduction

The SEA scoping report of the draft CAP Strategic Plan 2023-27 for Ireland is part of an assessment process mandated by EU Directive 2001/42/EC.

This report, an early stage of the process, identifies the relevant environmental issues using mainly the EPA "Ireland's Environment – An integrated Assessment 2020" report. It further sets out how the next stage will assess the measures in the draft Irish CAP Strategic Plan in the context of the nine objectives of CAP, using metrics from a long list of national data sets.

The relevant geographical territory is identified as the Republic of Ireland, and Northern Ireland where certain shared water bodies, landscapes and ecological corridors are concerned. It also identifies the relevant time frames from short-term to medium-term to beyond the end of the CAP plan, and the topics to be covered, using the themes developed in the EPA 2020 Report above.

The next stages of the SEA process will involve the consideration of alternative measures, preparation of an environmental report, integration of the SEA findings into the draft CAP Strategic Plan, consultations, integration of environmental considerations, publication of information on the decisions, plan implementation and monitoring.

IFA believes that there are some significant shortcomings in the SEA process even at this early stage, which need to be addressed.

IFA views

The SEA ignores economic sustainability.

Farm income viability, appropriately supported through CAP payments, is essential to enable farmers to make the investments an increased climate and environmental delivery will require. It is also essential to avoid land abandonment by farmers who are no longer able to make a viable income from their farming activity. The costs potentially imposed by certain measures in the CAP Strategic Plan must be critically assessed for their economic impact. IFA believes an **economic impact assessment** report for the CAP Strategic Plan is imperative, even required under the EU Better Regulation Agenda, and should be carried out either as part of the SEA, or alongside it.

- The EU "**Better Regulation Agenda"** was launched by the EU Commission in 2015, and is about improving EU law making by understanding its impact on citizens and businesses. **This includes impact assessments**, which are to be carried out *on "initiatives expected to have significant economic, social or environmental impacts."* These initiatives can be legislative proposals, non-legislative initiatives or implementing and delegated acts – the latter describing perfectly the CAP Strategic Plan 2023-2027.
- The SEA scoping report is part of a legally mandated process under EU Directive 2001/42/EC which requires that certain plans or programmes require **environmental assessment**. Article 1 of the Directive states its objective is *"to provide for a high level of protection of the environment (…) with a view to promoting **sustainable development**".*
- **Sustainability has three elements: environmental, of course, but also economic and social.**
- One of the SEA topics retained, against which to vet the CAP Plan, relates to "**Population and human health"**, and some farm income and economics considerations are slotted under this topic. "**Farm and rural economics" deserve inclusion as a stand-alone topic** because sustainability depends on it.

- The report states that the EU Commission's EU CAP objectives are part of the regulatory context in which it is being drawn up. Those include **viable farm incomes**, **increased competitiveness**, the improvement in the **position of farmers in the value chain**, attractiveness **for young farmers**, facilitation of **business development in rural areas** and the promotion of **employment, growth, social inclusion, and local development**. These important socio-economic considerations are not dealt with appropriately in this report.

The SEA fails to provide for the assessment of existing carbon sequestration and other environmental public goods by farmers.

IFA believes farmers legitimately expect **their farms' current contribution to carbon sequestration, but also to biodiversity enhancement, and to protection of water bodies** to be measured and credited to them.

IFA understands no comprehensive existing data source currently covers this area adequately. However, the **Department of Agriculture has begun an exercise to measure carbon sequestration and other environmental goods delivered on farms.** This exercise must be prioritised, and made an intrinsic part of the SEA scoping report and further stages of the environmental assessment process.

- **"Carbon farming"** is a concept emphasised in the EU Farm to Fork strategy communication of May 2020. The intention is that a new EU carbon farming initiative under the Climate Pact will promote a new business model, which **provides farmers with a new source of income and helps other sectors to decarbonise the food chain.**
- The **burden related to GHG emission reductions Irish farmers will be expected to carry** will likely reflect the relative importance of agriculture in Ireland's GHG emissions. It is therefore critical that the **carbon storage inherent in permanent grassland, hedgerows, trees, wetlands and riparian edges** currently present on farms is measured, and credited to farmers.
- **Many farmers have been participating in various voluntary programmes**, including ASSAP, IFA's Smart Farming, and various EIP schemes, which have seen them up their delivery of public environmental goods relating to climate, biodiversity, water quality and animal welfare. **Participation in Origin Green Sustainability Assurance Schemes** has also improved sustainability on large numbers of Irish farms. These farmers must be able to benefit from their engagement, and this can only happen if their performance in these areas is duly accounted for.

Other areas of concern to IFA

- **Adequacy of the data availability for the purpose of the SEA?** The report includes a lengthy list of data sources to be used in completing the environmental assessment, but it appears **at least some of those sources are patchy**, do not cover the totality of the territory, or are dated. Some of the sources of data are based on reports by organisations or members of the public (biodiversity maps, or reports of invasive species, for example). The latest data from the EPA emissions inventory goes back to 2015, while it has only 90 air monitoring stations scattered around the country, with, for example, none in Kildare or West Cork. It may well be the best data available, but if farmers' performance is to be assessed against it, it is important that the limitations of the data sets available be duly recognised in the report.
- ***Impact of potential environment regulation divergence with Northern Ireland?*** The report identifies Northern Ireland as being part of its territorial scope where shared water bodies, landscape features and ecological corridors exist. However, following from Brexit, Northern

Ireland may see environmental regulatory divergence in future which must not disadvantage Republic of Ireland farmers in the relevant areas.

- ***What about on-farm generation of renewable energy?*** The report emphasises the need for clean energy, using less fossil fuels and more biomass, and reducing on-farm energy use, all of which are both environmentally and economically desirable for farmers. However, it makes no mention of on-farm energy generation through anaerobic digestion, growing biomass, wind or solar. This omission should be corrected, to ensure farmers are supported by national policy to use their land to generate renewable energy, as well as produce food and public environmental goods. This needs to be addressed using non-CAP funds e.g. SEAI funding could help drive a significant increase in the use of clean energy
- ***Are there contradictions in the identification of potential significant environmental effects and established farm advice?*** Table 2 in the document suggests that the application of urea and lime to soils contributes to carbon dioxide emissions, yet suggests liming has potential positive effects. The former statement runs counter to the advice in the Teagasc MACC curve to favour protected urea and general emission reduction advice to improve soil fertility by spreading lime. The confusion must be removed from this section.
- ***Are all the legislation, plans and programmes listed in Annex A relevant?*** The report identifies the international, national and local legislation, plans and programmes which make up a "hierarchy of policies" within which the CAP Strategic Plans "must be considered". Some in the long list may have no legal standing – e.g., the EU Green Deal and its Farm to Fork and Biodiversity strategies. Others may have only tenuous connections to the contents of the CAP Strategic Plan – e.g., the National Policy Framework for Alternative Fuels Infrastructure for Transport, or the Wild Atlantic Way? Equally, a large number of references are made to international maritime programmes or legislation which may not be necessary to include when the various EU water-related directives relevant to agriculture are also in the list? IFA recommends a critical review of the list to ensure only relevant policies with a legal basis are included, without duplication with national or local implementing provisions.

Summary and conclusions

The SEA process cannot be limited to environmental considerations when the ability of farmers to respond to the increased environmental asks from the new CAP, and the CAP Strategic Plan, will be critically dependent on their economic viability.

Recognising that Irish farmers will have an important role to play in helping meet national greenhouse gas emission reductions targets, the SEA process must identify, measure and value the carbon storage capacity built up by farmers on their land, and ensure they are duly credited with it and with the water quality and biodiversity enrichment they already provide. Additional environmental goods delivered in compliance with the new CAP Strategic Plans must also be appropriately rewarded.

The limitations of the data available must be addressed in the medium to longer term and acknowledged in the short term preparation of the 2023-27 CAP Strategic Plan.

Finally, the long list of international, national and local legislation, programmes and plans must be critically examined to ensure all are directly relevant to the CAP Strategic Plan, duly legally based, and to avoid duplication.