

**Food Wise 2025 Draft SEA DAFM Public Consultation Feedback Form**

**Submission from: An Taisce**

**Date: 28 August 2015**

**Project:** Food Wise 2025 SEA  
**Organisation:** Department of Agriculture, Food and the Marine

Question	Comments
<p>Do you agree with the approach and methodology used for the Strategic Environmental Assessment?</p>	<p><b>No.</b></p> <p>As Prof. Matthews has identified [1] the SEA approach and methodology are fundamentally flawed due to an unacceptable failure to assess the environmental implications of the growth that is likely to result from Agri-Food 2025 (Food Wise 2025).</p> <p>Most egregiously, the SEA altogether ignores the rapid acceleration of agricultural growth since 2010. It does this by improperly limiting the scenarios considered to Base, Base+ and (so-called) Sustainable Growth, all of which include growth in ruminant food production. Other reasonable alternatives not involving growth in ruminant herds are ignored. The draft SEA also fails to consider a do-nothing scenario. No estimates of GHG emissions from the scenarios considered are provided in the draft SEA. This is unacceptable, and requires an entirely new SEA to be undertaken before Food Wise 2025 (FW2025) can be considered. Please see additional comments in the separate critique document of the draft SEA prepared by An Taisce.</p> <p>[1]: <a href="http://capreform.eu/food-wise-2025-agri-food-strategy-launched-in-ireland/">http://capreform.eu/food-wise-2025-agri-food-strategy-launched-in-ireland/</a></p>
<p>Have all relevant Plans, Programmes and Policies been identified and considered? If not can you advise of any gaps?</p>	<p><b>No.</b></p> <p>The need for mitigation in line with acting to limit to 2°C warming, as per Ireland’s international commitments, is not examined or even mentioned. The resultant likely need for reduced ruminant numbers (reflecting mitigation constraints on global dietary shifts) is</p>

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	<p>not examined at all or even mentioned.</p> <p>Regarding climate change resilience, a plan or policy is needed for Ireland's livestock-dominated agriculture that addresses likely near-future increased mitigation regulation within EU and international agreements, as well as likely risks exacerbated by climate change directly affecting Ireland (such as the fodder crisis).</p> <p>The SEA should also consider Ireland's commitments under The Climate and Clean Air Coalition (CCAC) [2].</p> <p>[2] <a href="http://www.ccacoalition.org/">http://www.ccacoalition.org/</a></p>
<p>Has the relevant baseline data been identified for each objective?</p>	<p><b>No.</b></p> <p>Like FW2025 itself, the SEA is extremely lacking in quantification of baseline data or of any projections compared to a baseline. Specifically no baseline emission data to air or water was provided for the agricultural sector, which would be essential for proper assessment of the cumulative pollutant impacts on the atmosphere and waterways, resulting from the greatly increased ruminant production and fertiliser use.</p>
<p>Are you aware of any additional on-going research or monitoring that should be considered in terms of the baseline environmental conditions?</p>	<p><b>Yes.</b></p> <p>(Significantly increased additional budgets for the EPA and academic environmental research are needed to monitor, study and report on the effects of the rapid increase in agricultural output to date and further increases planned under FW2025.)</p>
<p>Has the baseline information been correctly interpreted to identify the key challenges and opportunities arising from the plan?</p>	<p><b>No.</b></p> <p>A reasonable environmental baseline for GHG emissions should have been a continuation of the long-term decreasing pathway of emissions from 1999 to 2009. Instead a baseline of increasing production since 2010 has been used. This baseline selection can all too easily be interpreted as one that has been deliberately selected to bias the outcome of the assessment in favour of preferred forms of agri-business, and aiming to downplay the</p>

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	environmental impacts of FW2025. <b>At the very least, a baseline of emissions flatlined at the low 2009 level prior to FH2020 should have been adopted.</b>
Do the strategic environmental objectives (SEO's) cover all relevant areas?	They cover most areas but are not in any way sufficiently quantified or assessed in terms of baseline, or in terms of appropriate environmental limits for cumulative or annual pollution. Nor are plans for monitoring and verification credibly identified to achieve environmental objectives in any acceptable way. In these respects the <i>Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment (EU, 2013)</i> [3] regarding the assessment of long term and cumulative effects (see Section 4.4) has been ignored. <b>The SEA should be revisited to assess environmental and climate change impacts in light of this clear EU guidance. The current document is deficient in failing to do this.</b>  [3] <a href="http://ec.europa.eu/environment/eia/pdf/EIA%20Guidance.pdf">http://ec.europa.eu/environment/eia/pdf/EIA%20Guidance.pdf</a>
Do you consider that the alternative strategies outlined are reasonable and have been assessed correctly?	<b>No.</b>  Only three scenarios were considered, all involving growth in ruminant food production. No consideration was given to climate change resilience, adaptation, or to likely future mitigation regulation. The draft SEA does not appear to reflect an understanding of GHG impacts or climate change science, which are a minimal prerequisite for a competent and credible assessment. Even maintaining ('flatlining') emissions rates contributes very negatively to global warming and climate change. A true sustainable pathway should be based on increasing nutritional yield while dramatically decreasing total GHGs. By contrast, FW2025 posits increased inputs of fertiliser and feed, steadily increasing GHG emissions. This is unacceptable with regard to climate change mitigation policy.
Do you think that cumulative and trans-boundary impacts have been assessed fully?	<b>No.</b>  No quantified data was provided. With regard to climate change there is a complete failure to understand that any change in methane emissions due to FW2025 must be judged with regard to the short-term effects, which on a 20-year basis are 84 times greater per kg than for CO <sub>2</sub> . Given the urgent need to cut emissions rapidly to meet targets and commitments,

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	<p>ANY increase, such as in FW2025, must count as a severe negative impact. The draft SEA fails to mention Ireland's commitment as a member of The Climate and Clean Air Coalition (CCAC) to take specific measures to reduce emissions of short-lived GHGs.</p>
<p>Do you agree with the assessment outcomes and potential impacts addressed?</p>	<p><b>No.</b></p> <p>As described above, improper base-lining, lack of quantification and an evident lack of understanding mean that the assessment outcomes presented in the draft SEA are of no assistance in determining the likely impacts. A major specific error is the failure to analyse the impact of the change in suckler/beef policy. Food Harvest 2020 assumed there would be a significant decline in the beef suckler herd, due to economic forces. This suckler herd reduction would – it was argued – have off-set the projected increase in emissions from the dairy herd (see, Philip Farrelly and Co, 2014, Food Harvest 2020 Environmental Analysis Report).</p> <p>However in FW2025 it is envisaged that the suckler herd will be at least maintained to ensure a supply of high quality beef which can command a premium price. The GHG impact assessment in the SEA will therefore have to be revised to reflect this significant change in proposed policy.</p>
<p>Do you agree with the list of mitigation measures and monitoring proposed? Are there any further measures you consider should be included?</p>	<p><b>No.</b></p> <p>The list of mitigation measures are poorly defined, with no quantification of benefit, which together with the very brief and vague monitoring recommendations are entirely inadequate for both climate and general environmental protection.</p> <p>Given the dominance of ruminant based agriculture, mitigation measures are required to ensure Ireland is acting to cut GHG emissions in line with an equitable achievement of a 2°C max carbon budget. At the very least the measures controlling and capping total national GHGs proposed should be ensuring that agriculture is contributing to the 2020 and likely 2030 mitigation targets.</p> <p>As An Taisce has described in a <a href="#">recent consultation submission</a> [4] the current draft National Mitigation Plan is based on a National Policy Position (NPP) that is “vague,</p>

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	<p>unscientific, sectorally biased [toward agriculture] and morally unjust.”</p> <p>The SEA’s reliance on the NPP in regard to regulation of GHGs is meaningless because the NPP supplies no definition of how close the mooted ‘approach to carbon neutrality’ will actually come to zero net emissions from agriculture and land-use by 2050. Teagasc project that there will be no mitigation from Ireland’s agriculture whatsoever until beyond 2050. The SEA statements on GHGs regulation are therefore lacking in any substance.</p> <p>As stated above, the rapid increase in agricultural production to date and under FW 2025 is very likely to have significant negative environmental effects that require increased budgets for monitoring, research, reporting, and mitigation measures. FW2025 should only go ahead if the monitoring is in place and if research shows that the environmental impacts can be entirely mitigated.</p> <p>[4] <a href="http://www.antisce.org/articles/an-taisces-submission-to-the-national-mitigation-plan">http://www.antisce.org/articles/an-taisces-submission-to-the-national-mitigation-plan</a></p>
<p>Are you aware of any further environmental information that will help to inform the environmental assessment findings?</p>	<p>The following are a selection of highly relevant publications. It is a matter of serious concern that the assessment seems to have been undertaken with minimal competent reference to, or understanding of, the relevant literature.</p> <p>Ripple et al (2014) <b>Ruminants, climate change and climate policy</b>. Nature Climate Change 4. <a href="http://www.health.gov/dietaryguidelines/dga2015/comments/uploads/CID230_Ripple__2014_NatureClimateChange-Ruminants.pdf">http://www.health.gov/dietaryguidelines/dga2015/comments/uploads/CID230_Ripple__2014_NatureClimateChange-Ruminants.pdf</a></p> <p>Westhoek et al (2014) Food choices, health and environment: Effects of cutting Europe’s meat and dairy intake. Global Environmental Change 26 <a href="http://linkinghub.elsevier.com/retrieve/pii/S0959378014000338">http://linkinghub.elsevier.com/retrieve/pii/S0959378014000338</a></p> <p>FAO (2006) Livestock’s Long Shadow <a href="ftp://ftp.fao.org/docrep/fao/010/a0701e/a0701e00.pdf">ftp://ftp.fao.org/docrep/fao/010/a0701e/a0701e00.pdf</a></p> <p>Chatham House (2014) Livestock – Climate Change’s Forgotten Sector</p>

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	<p><a href="http://www.chathamhouse.org/publication/livestock-climate-change-forgotten-sector-global-public-opinion-meat-and-dairy">http://www.chathamhouse.org/publication/livestock-climate-change-forgotten-sector-global-public-opinion-meat-and-dairy</a></p> <p>An Taisce (2015) An Taisce's Response to Discussion Document on GHG Mitigation within Agriculture and Forestry Sector <a href="http://www.antaisce.org/articles/an-taisces-agri-greenhouse-gas-mitigation-plan-response">http://www.antaisce.org/articles/an-taisces-agri-greenhouse-gas-mitigation-plan-response</a></p>
<p>Do you have any other comments you wish to make on the Food Wise 2025 and/or the related SEA Environmental Report and Natura Impact Statement?</p>	<p><b>Food Wise is a food industry plan that is apparently gaining Government support without anything approaching due diligence from DAFM on the public's behalf. The draft SEA and Environmental Report adopts an inappropriately deferential approach to government policy, and could be interpreted as promotion of policy rather than independent assessment.</b></p> <p><b>There is sufficient evidence to conclude at this stage that the draft analysis by Philip Farrelly and Co. is misleading and totally inadequate and will have to be completely re-done. It is not in the national interest nor in the farm organisations' interests to have such a major agricultural policy plan based on a flawed and inadequate environmental assessment. (Further detailed comments are included in a separately attached document.)</b></p>