

Economics and Planning Division  
Department of Agriculture, Food and Marine  
Agriculture House  
Kildare Street  
Dublin 2

Sent by Post & Email

28<sup>th</sup> of August 2015

**Re: Consultation on the Environmental Analysis of Food Wise 2025**

To whom it may concern,

The Irish Co-operative Organisation Society Ltd (ICOS) welcomes the opportunity to participate in this important public consultation concerning the Environmental Analysis of Food Wise 2025.

Please find enclosed our completed responses to your questionnaire and ICOS looks forward to the publication of the final Environmental Analysis Report in due course.

Yours sincerely,



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Martin Keane  
President

## Food Wise 2025 Environmental Analysis Consultation Feedback Form

### 1. Do you agree with the approach and methodology used for the Strategic Environmental Assessment?

ICOS is satisfied with the approach and methodology used for the draft Strategic Environmental Assessment (SEA). ICOS recognises the comprehensive and detailed work undertaken to examine the environmental challenges facing the agri-food sector in the context of developing the Food Wise 2025 Strategy.

The SEA process was carried out in full compliance with EU Directive 2001/42/EC, with stakeholders provided with an opportunity to participate in a public consultation at the scoping stage. ICOS participated in this process by submitting a written submission following the publication of the Issues Paper. ICOS also acknowledges the related Appropriate Assessment process, which is reviewing the potential impact of Food Wise 2025 on Natura 2000 sites.

### 2. Have all relevant Plans, Programmes and Policies been identified and considered? If not can you advise of any gaps?

ICOS is confident that the draft SEA has reflected a wide range of existing plans, programmes and policies relevant across the entire agri-food sector. The farming community and the food sector complies with a wide range of EU and National legislation covering areas such as animal welfare, food safety and hygiene, water and soil quality, biodiversity, air quality and climate.

These policies will undoubtedly continue to evolve over the implementation period of Food Wise 2025, with likely competitiveness and environmental sustainability implications for the agri-food sector. For example, the Common Agricultural Policy is likely to go through a further reform before 2020, the EU's Climate Change and Energy Framework post 2020 is under review at present and bilateral and international trade negotiations are currently ongoing. As such, ICOS agrees with the approach of the authors of the draft SEA to view Food Wise 2025 as not a stand-alone strategy, but one which will be influenced and be influenced by a wider policy environment at an EU and international level.

### 3. Has the relevant baseline data been identified for each objective?

The identification of environmental baseline conditions are deemed critical to the SEA process. ICOS understands that the draft SEA contains all necessary baseline conditions required under EU Directive 2001/42/EC, namely population and human health, biodiversity, flora and fauna, air quality and climatic factors, water, soil and geology, landscape, cultural and material assets.

**4. Are you aware of any additional on-going research or monitoring that should be considered in terms of the baseline environmental conditions?**

ICOS is not aware of any additional on-going research or monitoring that should be considered in terms of the baseline environmental conditions.

**5. Has the baseline information been correctly interpreted to identify the key challenges and opportunities arising from the plan?**

ICOS has several observations concerning the interpretation of certain baseline information used to identify the key challenges and opportunities arising from the plan.

Population and Human Health:

ICOS believes that the draft SEA should have placed a greater emphasis on the impact of global population changes and greater urbanisation. The UN is forecasting that global population will rise from 7.3 billion today to 9.7 billion by 2050. This will result in a larger demand for protein including dairy and meat products.

The SEA scoping report also refers to the possible transboundary impact on human health arising from infant milk formula production in Ireland. The Irish dairy sector adheres to strict practices in relation to the promotion, advertising and labelling of infant milk formula products based on the WHO Code of Principles. There is a genuine demand and expanding global market for infant milk formula due to a wide range of factors including changing lifestyles. Ireland produces an infant milk formula product, which is healthy, safe, nutritious and traceable. This is extremely important in the context of the melamine crisis, which occurred in China in 2008 with tragic consequences. Furthermore, the high quality, sophisticated processes we use to “mine milk” are also used to produce ingredients with specific functionalities in geriatric nutrition and in sports nutrition.

Air Quality and Climatic Factors:

ICOS agrees with the author’s assessment that the greatest challenge to Food Wise 2025 will be the question of Greenhouse Gas emissions. It is the view of ICOS that at the heart of future climate change policy must be the objective of reducing the carbon intensity of agricultural activities, while increasing carbon sinks from other land use to offset emissions. There are significant efforts at mitigation taking place in Irish agriculture at present, through production efficiency, fertiliser and manure management, grazing management, improved genetics, better fertility and enhanced nutrition technologies. The industry is also currently implementing the Origin Green programme, a world leading quality assurance scheme, with farms being independently audited to the highest quality standards.

ICOS also notes that climate change may have an adverse impact on Irish agriculture due to increasing patterns of extreme weather and rainfall. According to Teagasc, the fodder crisis in 2013 cost the Irish agri food sector over €500 million. It is anticipated that such examples of extreme weather will become more frequent during in the year’s ahead.

### Water:

ICOS acknowledges that compliance with the Water Framework Directive and Nitrates Directive will be a considerable challenge for Irish agriculture. As such, the continuation of a derogation to the Nitrates Directive will be essential. This allows up to 5,000 farmers to farm at a higher stocking rate, subject to conditions. The Teagasc Agricultural Catchments Programme, funded by the Department of Agriculture is monitoring the effectiveness of these measures in improving water quality.

On a separate matter related to water quality, the draft SEA scoping report notes that increased volumes of processing could have implications for water quality. ICOS wishes to point out that there has been considerable investment and upgrading of dairy processing facilities in recent years, with the end of milk quotas on the horizon. Irish dairy processing facilities have reduced significantly their fresh water usage in their manufacturing plants and adhere to the highest possible standards in relation to waste water treatment.

### Landscape:

The draft SEA scoping report notes the possibility of landscape changes due to dairy expansion. ICOS does not anticipate any significant changes in landscape due to increased levels of dairy production. Irish agriculture is traditionally associated with low levels of land mobility, which is a key structural impediment facing the Irish dairy sector. The introduction of new incentives to encourage the greater availability of long term leases and the promotion of collaborative farming options are key recommendations in the Food Wise 2025 strategy to overcome this structural challenge.

## **6. Do the strategic environmental objectives (SEO's) cover all relevant areas?**

The draft SEA includes a range of strategic environmental objectives (SEA) with associated targets and indicators. ICOS is satisfied with the scope and breath of the SEO's included in the draft SEA.

## **7. Do you consider that the alternative strategies outlined are reasonable and have been assessed correctly?**

The draft SEA considers three alternative strategies, namely Best Case, Best Case + and the Sustainable Growth Scenario. The Sustainable Growth scenario was selected as it delivered the best available environmental outcomes, according to the Report. ICOS fully supports the adoption of this approach, which is based on the concept of sustainable intensification. This will allow the agri food sector to grow and expand market share within measurable sustainability criteria. The reality is that Ireland's food products are measured by their quality, which is intrinsically linked to our environment, temperate climate and grass based production system.

The growth figures presented in Best Case + would appear reasonable in the context of dairy expansion following the abolition of milk quotas. The Food Harvest 2020 strategy established a target of increasing the 2008/2009 average annual milk production of 5bn litres to 7.5bn in 2020. Best Case + suggests an additional increase of 1.3bn litres over a 5 year period to 2025. However, it is difficult to comment in any detail on the perceived "significant negative effect"

on the environment that this approach would have, due to the lack of available data contained in the draft SEA.

**8. Do you think that cumulative and trans-boundary impacts have been assessed fully?**

The draft SEA considers that the most significant transboundary effect could result from potential increases arising from GHG emissions and ammonia. However, the report further states that due to measures contained in the final strategy for limiting GHG emissions and ammonia, no consequent transboundary effect is predicted. ICOS agrees with this assessment and in addition points out that Ireland's GHG emissions from agriculture should be viewed in the context of the 35 million people we feed throughout the globe through exports, as opposed to our population of 4.5 million people. Ireland's dairy and livestock products are among the most carbon efficient in the world. Any limitations or restrictions imposed on Irish agriculture due to GHG emissions would result in less efficient producers meeting the growing demand for food throughout the world. This scenario known as carbon leakage would result in negative consequences for both the global environment and the Irish economy.

**9. Do you agree with the assessment outcomes and potential impacts addressed?**

The draft SEA assesses outcomes and potential impacts on a range of environmental criteria, while acknowledging that the Food Wise 2025 strategy does not include specific sectoral level growth targets. The agri-food sector will face many challenges during the implementation of Food Wise 2025 in the areas of biodiversity, air quality, water, soil and climate change. However, the adoption of the sustainable intensification approach, as the foundation for Food Wise 2025 will on the one hand deliver positive socio-economic effects for the agri food sector and the broader rural community, while on the other hand, serve to protect and sustain our environment and landscape. This process will be assisted by the implementation of a range of existing environmental legislation, together with measures under the CAP and RDP and sectoral initiatives such as Origin Green.

**10. Do you agree with the list of mitigation measures and monitoring proposed? Are there any further measures you consider should be included?**

The draft SEA contains a broad list of mitigation measures and monitoring actions. It is widely acknowledged that the challenge of reducing GHG emissions from Irish agriculture will be extremely demanding. It is essential that the farming community receives full support and avails of the best available scientific research to assist with national efforts to reduce GHG emissions. There is a considerable onus on education and research professionals within the agri food sector to translate science and research into actions at farm level. ICOS believes that it is essential for all farmers, and not just the few, to benefit from the dissemination of knowledge on better farm practices, which will ensure greater efficiency and profitability at farm level. Furthermore, ICOS believes that the Government should also consider innovate taxation measures to foster the development of best practice in environmental sustainability.

At farm level, a broad range of mitigation measures from breeding and genetics to grassland and soil management can reduce GHG emissions. However, it is also widely recognised that climate change mitigation in agriculture is limited as the GHG's caused by agriculture are due to natural processes.

ICOS notes that efforts to offset GHG emissions from agriculture through carbon sequestration will have to be closely measured and monitored in the context of Food Wise 2025. Advanced research into the carbon sequestration potential under grassland soils will be required, with appropriate accounting methodology developed in order to accurately record its contribution as a carbon sink.

Moreover, the full implementation of Ireland's national forestry programme, which aims to expand afforestation by 11% of land area today to 18% by 2046 is of critical importance and will require ongoing monitoring.

**11. Are you aware of any further environmental information that will help to inform the environmental assessment findings?**

The draft SEA considers an extensive and detailed amount of environmental information, which informs the baseline conditions, SEO's and mitigation measures. As such, ICOS is not aware of any further environmental information that will help to inform the environmental assessment findings.

**12. 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 Assessment?**

ICOS wishes to conclude by reaffirming the commitment of the co-operative sector to adoption of the highest sustainability and environmental protection measures.

Ireland's agri food sector over generations has played an important role in maintaining the quality of the Irish environment, with farmers acting as custodians of the countryside. Agriculture and forestry accounts for over 70% of total land use in Ireland. Overall, this is a very high percentage compared to the OECD average of under 40%. As a result, the relationship between agriculture and the environment is more intrinsic in Ireland when compared to other nations and regions. In Ireland, we are fortunate to have our natural, temperate grass based production system. This is our key competitive advantage. As a result, we have built our global reputation as a producer of high quality, safe and carbon efficient food. Food Wise 2025 which is based on sustainable intensification will enable the agri food sector to grow further and develop new markets, while meeting the highest environmental standards.

In conclusion, Food Wise 2025 places a significant emphasis on the three pillars of sustainability – social, economic and environmental. ICOS strongly believes that the co-operative model is uniquely placed to deliver in practice these three equal and complementary objectives. Our dairy, livestock and rural business co-operatives ensure that primary producers are involved in the upstream and downstream ends of the food sector, providing tangible and lasting social, economic and environmental benefits for the entire rural economy.