



Ms Siobhan Dowling
Economics & Planning Division
Department of Agriculture, Food and Marine
Kildare Street
Dublin 2

15th May 2015

Our Ref: SCP150401.1

Re: Scoping for the Strategic Environmental Assessment of Agri-Food Strategy 2025

Dear Ms Dowling,

We acknowledge your notification dated 10th April 2015 in relation to the scoping for the Strategic Environmental Assessment of Agri-Food Strategy 2025 consultation and welcome the opportunity to provide input at this stage of the SEA and the Strategy preparation.

Our submission to the initial consultation stage for the Strategy and our previous submission in relation to the environmental analysis for Food Harvest 2020 are attached. Our feedback and information provided at the Scoping Workshop on April 9th should also inform the overall assessment. Previous EPA submissions on the Rural Development Programme, Forest Policy Review and Ireland's Forestry Programme are also attached. The relevant aspects of these submissions should be taken into account in preparing the Strategy and undertaking the SEA.

Overall, the EPA is broadly supportive of the aims and vision of *Food Harvest 2020/Agri-Food Strategy 2025* provided that it does not result in negative impacts for the environment at national, regional or local levels. Damage to the environment will have an adverse effect on the image and credibility on which *Food Harvest 2020/Agri-Food Strategy 2025* is built. The on-going development of the agriculture sectors without damaging the environment upon which it depends is a significant challenge.

The SEA Directive requires monitoring of the significant environmental effects of implementation of plans and programmes. The proposed environmental monitoring programme for the Strategy should be reflected in specific commitments in the overall Strategy. This should take into account relevant existing national environmental monitoring programmes including WFD, biodiversity, air quality and greenhouse gas emissions related monitoring and predictions. Clear sector related objectives, targets and indicators should be linked with relevant environmental objectives, targets and indicators. These should be aligned with relevant international, EU and national environmental obligations, commitments and targets. Provisions for environmental monitoring reporting should also be set out in the Strategy.

Consideration should also be given to the overall governance of implementation of the Strategy for the specific sectors and this should be reflected in commitments in the Strategy. Clear responsibility should be assigned for delivery of the overall Strategy along with the structures to be established to deliver the sector targets and related environmental targets. The merits of lower level regional /catchment based sector implementation structures and relevant guidance and assessments should also be considered.

Specific observations on the SEA Strategic Environmental Assessment Issues Paper are included in Attachment 1. A list of useful environmental resources and related links is provided in Attachment 2.



Guidance on the SEA process and SEA Spatial Information Sources are available on the EPA website. These can be consulted at <http://www.epa.ie/pubs/advice/ea/>

We will continue to provide feedback and input to the Strategy and the SEA through our role in the Agri 2025 Environmental Analysis Steering Group and the Agri 2025 Strategic Committee.

We look forward to working with the Department of Agriculture, Food and Marine to integrate environmental considerations throughout the development of the Strategy and promote sustainable development of agriculture and food production in Ireland.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tadhg O'Mahony'.

Tadhg O'Mahony

*SEA Section
Office of Environmental Assessment
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Inniscarra
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Attachment 1 - Specific Comments on the SEA Issues paper

Section 1 - Introduction

Section 1.2 SEA and Appropriate Assessment

Monitoring of Strategy Implementation

Figure 1 should be extended to incorporate SEA related monitoring, follow up, review and associated reporting.

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Clear sector related objectives, targets and indicators should be linked with relevant environmental objectives, targets and indicators. These should be aligned with relevant international, EU and national environmental obligations, commitments and targets. Provisions for environmental monitoring reporting should also be set out in the Strategy.

Section 1.4 Overarching Theme of the Strategy

The reference attributed to Birdwatch Ireland related to “*environment protection should be a prerequisite for the sector in Ireland, rather than a challenge to overcome*” should be reflected in the overall approach to SEA, AA and the development of the Strategy.

Section 1.6 - Legislative Framework

This should include reference to the Nitrates Directive.

Section 1.7- Other Relevant Plans and Programmes

Include reference to and consider relevant aspects of:

- Nitrates Action Programme
- DAFM current public consultation on Greenhouse Gas Mitigation <http://www.agriculture.gov.ie/ghgmitigationconsult/> and Climate Adaptation.
- Rural Development Programme
- Forest Policy Review
- National Strategic Aquaculture Plan -in preparation - due May/ June 2015
- Draft Bio Energy Plan
- WFD River Basin Management Plans -second cycle to commence
- CFRAMS and associated Flood Risk Management Plans - in preparation
- Regional Planning Guidelines
- Local Authority Land Use Plans
- Relevant Northern Ireland Plans
- Additional Plans and Programmes identified at the Scoping Workshop on April 9th.

The relevant aspects of the above, and other relevant Plans and Programmes should be taken into account when assessing the potential for cumulative effects arising from the implementation of the Strategy.



Section 2 - Agri-Food Strategy 2025 Draft Objectives

The national and international environmental sustainability standards referred to need to be clearly defined for relevant aspects of the environment. The goal to meet and surpass environmental sustainability standards will need to be linked to appropriate environmental measurement, reporting and verification.

Section 2.1 Sectoral Draft Objectives

Dairy: Reference is made to minimising the impact of dairying. Those dairy farmers with the capacity to expand are most likely already nitrates derogation farms (economies of scale) and where they are not they will have to apply for derogation.

Forestry and Sustainable Land Management: Reference should be made and consideration given to the DAFM's Forest Policy Review and Ireland's Forestry Programme 2014-2020. This is in the context of the current emphasis on forestry and land use change. In this regard, reference should also be made to Ireland's submission to the EU under Regulation 529/2013/eu in early 2015 to:

<http://www.agriculture.gov.ie/media/migration/ruralenvironment/climatechange/InfoonLULUCFactions180315.pdf>

Section 3 Baseline Environment and Potential Environmental Issues

Ireland's Environment 2012 identifies four key environmental challenges for Ireland: *Valuing and protecting our Natural Environment*, *Building a Resource-Efficient Low-Carbon Economy*, *Implementing Environmental Legislation* and *Putting the Environment at the Centre of our decision making*. These challenges should be considered in developing the Strategy and relevant commitments included to contribute to addressing these challenges in order to ensure sustainable development of Ireland's agriculture and food production.

Section II of *Ireland's Environment 2012* describes six key thematic areas and these should be considered and assessed in the SEA and Strategy preparation. These include *Greenhouse Gases and Climate Change*, *Air Quality (and Transboundary Air Emissions)*, *Water*, *Sustainable Resource Use*, *Consumption and Waste*, *Nature and Biodiversity* and *Land & Soil*.

Section 3.3 Air Quality and Climatic Factors

The reference to NO_x emissions relates to nitrogen oxide and not N₂O which is nitrous oxide. In air pollution terminology NO_x refers to NO and NO₂. The reference to Ireland's NO_x emissions as being below the 2010 National Emissions Ceilings Directive target of 65 kt should be reviewed. EPA's latest data submission under the Convention on Long Range Transboundary air pollution shows a national total emission of 79 kt in 2013;

http://www.ceip.at/ms/ceip_home1/ceip_home/status_reporting/2015_submissions/

The 10% of NO_x emissions referred to is primarily a result of fuel combustion in the agriculture forestry and fisheries sectors (tractors, heating, boats etc.). NO emissions from soils and fertiliser application have not been included in our reporting to date, due to emission factor uncertainty, they may, however, be included in future reporting.

The 2010 ceiling for NH₃ is referred to. While this is the case, more stringent targets are in place under the Gothenburg Directive (2020, which DECLG are due to ratify) and discussions are on-going for the National Emissions Ceilings Directive 2030 which will take into account the 2020 targets under the Gothenburg Protocol (http://www.unece.org/ro/env/lrtap/multi_h1.html). Unless mitigation measures are put in place (e.g. low emission land spreading) Ireland is not in a position to meet the 2020 target.

Under potential environmental issues reference is made to increased methane and NO_x emissions. NO_x is not classified as a greenhouse gas, it is more correctly classified as an air pollutant (although it is an indirect GHG).



The reference made to the Climate Change Strategy and energy white paper should be updated. Agricultural emissions are included in the non-ETS sector emissions under the Effort Sharing Decision (406/2009) which requires a 20% reduction on non-ETS emissions by 2020 from a 2005 baseline.

See:

<http://www.epa.ie/pubs/reports/climatechange/thesimpleguidetoirelandsgreenhousegasemissions.html#.VuJSQ6ROMdU>

The energy aspect has also moved on significantly as can be seen at:

<http://www.dcenr.gov.ie/Energy/Energy+Planning+and+Electricity+Corporate+Division/> and also <http://www.dcenr.gov.ie/energy/energy+efficiency+and+affordability+division/national+energy+efficiency+action+plan.htm>

and at:

<http://www.dcenr.gov.ie/Energy/Sustainable+and+Renewable+Energy+Division/Renewable+Energy+Directive+and+National+Renewable+Energy+Action+Plan.htm>

Section 3.4 Water

The recent *Draft Report on Significant Water Management Issues in Ireland* should be taken into account in the SEA. The relevant aspects relating to the agriculture sector should be reflected in relevant commitments, objectives and targets in the Strategy. This document was recently provided to DAFM and the relevant section in DAFM should be consulted in this regard.

The EPA's series of *Water Quality in Ireland Reports* is at the advanced stage of completion. This document is likely to be published in June. There would be merits in consultation with the EPA's Environmental Monitoring and Assessment Unit in advance of the publication with a view to establishing significant developments since the previous report.

Consideration needs to be given to the spatial areas where potential intensification and increases in production are likely. These will need to be examined in the context of existing water quality and sensitivity. This is an aspect which merits further consideration at a more regional / catchment basis for individual sectors during implementation. A commitment to this should be provided in the Strategy.

Greater emphasis will need to be provided in the Strategy on the development and implementation of sector specific management strategies including mitigation measures. Issues to consider will include:

- Decoupling growth from environmental impact.
- Arriving at measures that are achievable in practice.
- Treating water quality, biodiversity and human health (e.g., drinking water) holistically.
- Greater emphasis on the role of sediment in the context of the likelihood of greater land reclamation as a means of increasing production.
- Taking account of the optimisation of 'services' that the landscape/land surface can provide. For instance, the optimal function of some areas could be intensive dairying, whereas in others it could be high nature value farming. The integrated catchment management approach (ICM), summarised in the Attachment 3, enables this evaluation to be made.
- In a more limited way, as it deals only with the services provided by soils, Teagasc, is proposing the 'functional land management' approach as a means of doing this.

Attachment 2: Some Useful Environmental Resources

Environmental Topic/ Aspect	Link to Reports /Resource
Ireland's Environment	http://www.epa.ie/irelandsenvironment/
Surface Water	http://www.wfdireland.ie/index.html http://www.epa.ie/pubs/reports/water/waterqua/
Ground Water	http://j.mp/gsigroundwater http://www.epa.ie/downloads/pubs/water/ground/
Drinking Water	http://www.epa.ie/pubs/reports/water/drinking/
Waste Water	http://www.epa.ie/pubs/reports/water/wastewater/
Bathing Water	http://www.epa.ie/pubs/reports/water/bathing http://splash.epa.ie/#
Biodiversity	http://www.npws.ie/guidance-appropriate-assessment-planning-authorities http://www.npws.ie/publications
Flood Prevention and Management	www.floodmaps.ie www.cfram.ie
Air	http://www.epa.ie/pubs/reports/air/quality/ http://www.epa.ie/climate/emissionsinventoriesandprojections/nationalemissionsinventories/transboundarygasemissions/
Greenhouse Gas (GHG) Emissions	http://www.epa.ie/climate/emissionsinventoriesandprojections/nationalemissionsinventories/ http://www.epa.ie/climate/emissionsinventoriesandprojections/nationalemissionsprojections/
Climate	http://www.environ.ie/en/Environment/Atmosphere/ClimateChange/ http://www.epa.ie/pubs/reports/research/climate/ http://www.epa.ie/pubs/advice/ea/integratingclimatechangeintoseainireland.html
Waste Management	http://www.epa.ie/pubs/reports/waste/
Energy Conservation	www.sei.ie
Landscape Character Assessment	http://www.heritagecouncil.ie/
Geology Geomorphology	http://www.gsi.ie/Mapping.htm
SEA	http://www.epa.ie/pubs/advice/ea/ SEA GIS Search and Reporting Tool http://www.environ.ie/en/DevelopmentHousing/PlanningDevelopment/EnvironmentalAssessment/EIASEAGuidance
SEA Spatial Information	http://www.epa.ie/pubs/advice/ea/seaspatialinfomationsourcesmay2015.html

Attachment 3: Steps in the Integrated Catchment Management Process

Adapted from USEPA (2008)

