

Maria Talbot,
Climate Change and Bioenergy Policy Division,
Pavilion A, Grattan Business Centre,
Dublin Road,
Portlaoise,
Co. Laois.

Our Ref: FoodWise2025/NMcG

26th August, 2015

Re: *Food Wise 2025* and associated draft Environmental Analysis incorporating a Strategic Environmental Assessment and an Appropriate Assessment)

Dear Sir/Madam

We refer to your documentation regarding Environmental Authorities Consultation on *Food Wise 2025* and wish to make the following submission. As the draft environmental and Appropriate Assessment reports are extensive documents we are only making general comments regarding same.

Inland Fisheries Ireland (IFI) is a Statutory Body established on the 1st July 2010. Under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) *the principal function of IFI is the protection, management and conservation of the inland fisheries resource.*

Under section 7(3) of the IFI Act it is stated that *without prejudice to subsection (1), IFI shall in the performance of its functions have regard to:*

(g) the requirements of the European Communities (Natural Habitats) Regulations 1997 (S.I. No. 94 of 1997) and the need for the sustainable development of the inland fisheries resource (including the conservation of fish and other species of fauna and flora habitats and the biodiversity of inland water ecosystems),

(h) as far as possible, ensure that its activities are carried out so as to protect the national heritage (within the meaning of the Heritage Act 1995).

Fish need unpolluted water and abundant food in a habitat that provides spawning areas, shelter and freedom of movement. The bed and soil of a natural river and the associated aquatic and riparian vegetation combine to provide the food chain on which fish depend. A natural river channel is characterised by the morphological features which are vital for the life cycle of fish: gravel shoals or reed beds for spawning, pools and riffles where fish rest and feed, and turbulent reaches which enhance oxygenation.

Any intensification of farming practices may pose an unacceptable risk to the fisheries habitat with regard to water quality from such practices as overfertilisation and cattle access. A reduction in water quality can result in reduction in dissolved oxygen, eutrophication (nutrient enrichment), habitat degradation and fish kills.

The physical habitat is also threatened from cattle access, loss of riparian/buffer zones, erosion, erection of barriers, inappropriate watercourse drainage, inappropriate land drainage, inappropriate afforestation, erosion, etc.

The EU Water Framework Directive (2000/60/EC) entered into force in December 2000 requires the protection of the ecological status of river catchments – this encompasses water quality and requires the conservation of habitats for ecological communities. One of the primary objectives of the Directive is to establish a framework which prevents further deterioration and protects and enhances the status of aquatic ecosystems. Protection of aquatic ecosystems requires that river systems be protected on a catchment basis.

Article 5 of the 2009 Surface Water Regulations requires that a public authority (including DAFM), in performance of its functions, shall not undertake those functions in a manner that knowingly causes or allows deterioration in the chemical or ecological status of a body of surface water. Article 28(2) of the said Regulations states that a surface water body whose status is determined to be less than good shall be restored to at least good status not later than the end of 2015.

IFI notes that *Food Wise 2025* recognises that protection of the aquatic environment/habitat not only requires the protection of water quality but also necessitates the protection and maintenance of physical habitat and hydrological processes/regimes.

IFI would advise that the precautionary principle should also apply with respect to any development where the potential adverse effects are not fully understood, in which case the development should not proceed. The burden of proof should be placed on those who argue that a proposed activity will not cause significant environmental harm, and make them responsible for any negative impacts that might arise for water quality and resources.

Given that Climate Change is likely to have an impact on surface water summer base flows the opportunity should be taken to address the sustainability of both current and future agricultural practices regarding surface and ground water management, e.g. abstraction for irrigation, water supply, effluent discharge, etc. *Food Wise 2025* should adequately address the need to meet Water Framework Directive objectives regarding this issue

It is difficult to outline as to what mitigation measures may prove effective. Obviously current thoughts on the implementation of any awareness measures, along with training/education needs need to be based on research into the impacts of any farming practices. The issue is however once a negative practice is highlighted it may be much too late to incorporate any changes into any awareness or training/education practices. Therefore IFI would advise that the precautionary principle should apply with respect to any practise where the potential adverse effects are not fully understood, in which case the practice should not proceed. The burden of proof should be placed on those who argue that a proposed activity will not cause significant environmental harm, and make them responsible for any negative impacts that might arise for water quality and resources.

Aquaculture should be carried out in a sustainable manner and should not pose a risk to the native populations.

Please bear all of the above in mind in taking *Food Wise 2025* forward

We look forward to further communication on this consultation in due course.

Yours faithfully

pp Noel McGloin

Brian Beckett

Director – IFI Dublin

Tel - 353 (1) 8842696

Mob - 353 (0) 87 9690672

Email - brian.beckett@fisheriesireland.ie

Web - www.fisheriesireland.ie

Cc Dr. Greg Forde, Head of Operations, Inland Fisheries Ireland.

