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**Submission to the Department of Agriculture, Food and the Marine on the
AGRI-FOOD STRATEGY 2025 Strategic Environmental Assessment Issues
Paper and Policy Guidance Note for the Protection of Natura 2000 sites -
May 2015 - Inland Fisheries Ireland**

Inland Fisheries Ireland welcomes the opportunity to offer comment in relation to the *Agrifood Strategy 2025* consultation process. Inland Fisheries Ireland is supportive of the development of the Agrifood industry as long as any proposed development is environmentally sustainable.

General Introductory Comment

Inland Fisheries Ireland (IFI) is the statutory authority tasked under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) with responsibility for the conservation, protection and development of the inland fisheries resource and recreational sea angling. “Fisheries” includes all inland fisheries recreational and commercial, sea angling and mollusc fisheries stipulated under the Fisheries Acts, the physical habitat upon which the fishery relies, the facilities and access, the quantity and quality of the water and the plant and animal life on which fish depend for shelter and food and the spawning areas where in fish deposit their eggs. IFI are the responsible agency in respect of the licensing and management of commercial and recreational fishing for salmon, with protection responsibilities at sea out to 12 miles from baselines. IFI also has a research function which has inter alia conducted extensive research into the impacts of marine salmon farming on wild salmonids.

Inland Fisheries Ireland (IFI) is charged with the following functions and responsibilities under the 2010 Inland Fisheries Act – Section 7:

- (1) The principal function of IFI is the protection, management and conservation of the inland fisheries resource.

(2) Without prejudice to *subsection (1)* the general functions of IFI are to—

- (a) promote, support, facilitate and advise the Minister on the conservation, protection, management, marketing, development and improvement of inland fisheries, including sea angling,
- (b) develop and advise the Minister on policy and national strategies relating to inland fisheries including sea angling, and
- (c) ensure implementation and delivery of policy and strategies developed under *subsection (b)* as agreed with the Minister.

(3) Subject to *subsection (1)*, IFI shall—

- (a) subject to this Act, protect the inland fisheries resource and generally enforce the Inland Fisheries Acts,
- (b) ensure that any fishery, hatchery or fish farm in the possession or occupation of IFI is managed, conserved, protected, developed and improved, or otherwise dealt with, in accordance with the corporate plan prepared in accordance with Section 41,
- (c) in accordance with such corporate plan, promote and encourage the management, conservation, protection, development and improvement of the fisheries which are not in its possession or occupation,
- (d) ensure that any oyster or other mollusc fishery is protected in accordance with such direction of the Minister as relates to a fishery of that kind,
- (e) encourage and develop angling for salmon, trout, coarse fish and sea fish and, for the purposes of any or all of those kinds of angling, provide such facilities and amenities, if any, as may be required,
- (f) encourage, promote, organise and co-ordinate together with the inland fisheries owners, bodies and organisations, the voluntary development of inland fisheries catchment management plans and for that purpose have regard to the distinctive circumstances which pertain in each of the catchment systems and consult with and involve local authorities and other interested bodies and organisations,
- (g) in the performance of its functions have regard to 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),
- (i) ensure the effective and efficient deployment of resources, performance of functions, drawing up of estimates and the provision of services,

- (j) administer such schemes, grants and other financial facilities requiring the disbursement of European Union and such other funds as may from time to time be authorised by the Minister with the consent of the Minister for Finance, and
- (k) support angling promotion and marketing activities and co-operate with relevant State agencies and such sectoral interests as IFI considers relevant in developing international promotion and marketing strategies and activities in relation to game, coarse and sea tourism angling.

In general we are in broad agreement with the Issues Paper and the Policy Guidance Note.

We are including the following comments with regard to the Strategic Environmental Assessment – Issues Paper

In Section 1.6 **Legislative Framework** (page 5) – there is no mention of The **Water Framework Directive (Directive 2000/60/EC)** WFD in this section of Issues paper (although it is covered in Section 3.4 – **Water**). This Directive has been transposed into Irish legislation by the 2009 Surface Water Regulations (S.I. No. 272 of 2009).

Article 5 of the 2009 Surface Water Regulations requires that a public authority (including The Minister for Agriculture, Fisheries and Food), 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. Also 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.

In Section 3.2 **Biodiversity, Flora and Fauna** (page 11) – please include the following line - **It should be noted that while many of river systems are not designated under the Habitats Directive, they hold species that are designated under that directive, i.e. Atlantic salmon, Sea, River and Brook lamprey (listed as an Annex II Species under the European Habitats Directive).**

Potential Environmental Issues – the potential negative impacts on aquatic habitats should be addressed with reference to water abstraction and riparian zone protection, i.e. increased abstraction and intensification of land use (e.g. grazing/cereal production/forestry) can have a negative impacts on the physical characteristics of watercourses if not carefully controlled.

With regard to Agrifood in general and Seafood in particular we have the following general comments to make with regard to both documents:

The long-term environmental sustainability of any enterprise that may impact on the status of fish species, their habitats, fisheries and/or the recreational angling or commercial fisheries that may utilise these resources is of primary concern to IFI. In relation to fish, this documents focuses primarily on species and habitats protected under European Directives. From an IFI perspective all species within its remit require protection and

management for conservation. IFI would advocate that for important species (or locally valuable species (e.g. bass or sea trout)) that the precautionary principle would apply to allow a reasonable period to accumulate any important datasets that may not be currently available. This approach would afford a minimal level of protection until such time as the data are collected and analysed and an informed decision can be made. These data would also support an analysis to ensure that the proposed aquaculture development would not impact on the socio-economic value of the important recreational angling sector. A recently commissioned study on the socio-economic value of the sector (IFI, 2013) found that angling and angling tourism in Ireland is generating in excess of €0.75 billion within the Irish economy every year.

Recent legislative changes (SI No. 477 Of 2011) have made provision for IFI via the Minister for Communications Energy and Natural Resources (DCENR) to become the competent authority with additional responsibilities as part of Ireland's implementation of the Habitats Directive. These include responsibility for the conservation of wild salmon, pollan, shad, smelt and lamprey. IFI is the responsible agency in respect of the licensing and management of commercial and recreational fishing for salmon, with protection responsibilities (as already outlined) at sea out to 12 miles from baselines. As described in the consultation report, compliance with the Habitats and Birds Directives is a key policy and regulatory consideration impacting in particular on aquaculture, but increasingly on fisheries, especially but not limited to inshore shellfish fisheries using towed gear.

As highlighted in Harvest 2020 recommendations the industry should continue to develop environmentally sustainable fishing and aquaculture production methods to secure a sustainable resource base and to underpin the development of a smart, green and clean image which contributes to the overall strategy for the food industry.

The seafood aspect of the Agri-Food Strategy 2025 would be enhanced through consideration of Ireland's National Biodiversity Plan, actions for Biodiversity 2011-2016, in particular how the Agri-Food Strategy could consider the specific actions to restore sea trout stocks. While these stocks are not protected under the Habitats Directive they are genetically distinct to their river of origin and spend various periods during their life cycle in the sea (often migrating long distances).

For more specific comments and recommendations with regard to the seafood aspects of the Agri-Food Strategy SDP – please refer to IFI submission regarding the Seafood Development Plan as submitted to DAFM (April 2015).

We would appreciate if you could take this submission on board.

Yours sincerely

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