



**Iascach Intíre Éireann
Inland Fisheries Ireland**

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RE: 'Agri-food Strategy to 2030' - Strategic Environmental Assessment Scoping Consultation

24th September, 2020.

Dear Enda,

Thank you for the opportunity to contribute to the Departmental response on the proposed 'Agri-food Strategy to 2030' SEA Scoping Consultation. These comments reflect the views of IFI in respect of the above mentioned strategy.

About Inland Fisheries Ireland's Role

Inland Fisheries Ireland is the statutory authority tasked under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) with responsibility for the protection, management, and conservation, of the inland fisheries resource and recreational sea angling. IFI is mandated to ensure that the fisheries of the State are protected. To protect means to keep safe, defend, to shield from danger, injury or change. "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. The protective role of IFI relates to all aspects of the aquatic environment and all factors that influence the biotic communities within waters, which in any way relate to the propagation of fish populations. Ireland has in excess of 70,000 km of rivers and streams and 144,000 ha of lakes, all of which fall under IFI's fisheries management jurisdiction. Many of these watercourses discharge directly to the sea and support species which utilise the marine environment for parts of their life cycle (e.g. salmon, sea trout, eel, lamprey species).

Aquatic Biological Diversity

Under section 7(3) of the IFI Act it is stated that IFI shall in the performance of its functions have regard to (g) the requirements of the European Communities (Natural Habitats)



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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).

The Irish implementing legislation for the Habitats Directive identifies the Minister for Communications, Climate Action and Environment as having a role in carrying out monitoring of the status of the relevant fish species. The present IFI R&D programme fills this Ministerial obligation and complements it by including those fish species listed in the current Red Data Book and not covered by the Habitats Directive including the conservation of diadromous species including salmon, shad, smelt, and lamprey. IFI also has responsibility for pollan and the recreational angling aspect of marine fish species. Pollan for example are a rare endangered and protected species listed and protected under Annex 5 of the Habitats Directive. The Irish Pollan (*Coregonus Pollan*) is unique to the Island of Ireland with its current known distribution being limited to five lakes, Lough Allen, Lough Ree and Lough Derg and Lough Neagh and Lower Lough Erne. The Arctic char (*Salvelinus alpinus* – as mentioned in Section 3.2 of the SEA Scoping Report) is another example of a highly sensitive fish species endemic to Irish upland waters and which is protected under national legislation. Furthermore the European Eel is now endangered and additional protection measures have also been introduced in that regard - it is incumbent on Ireland to ensure that the eel and its range and habitat are properly protected. Please also note that there are many surface waters, which are not formally designated but which support stocks of Annex II species designated under the habitats Directive.

The National Fisheries Resource – sustainable exploitation and the economy

IFI is 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 is also mandated to market and promote Irish recreational angling in both the domestic and foreign tourism markets. This brief acknowledges the importance of angling as a contributor to the Irish economy both in terms of revenue generated and the jobs it sustains.

It is important to highlight that (freshwater and marine recreational angling) directly supports over 11,000 existing Irish jobs, many of which are located in the most peripheral and rural parts of the Irish countryside and along our coastline (IFI, 2015). Within the sector participation rates totalled 446,000 people who were involved in recreational angling in Ireland in 2015, with over 170,000 of these travelling from Northern Ireland and overseas. Over a quarter of a million Irish adults (273,000) held a fishing rod in that period, with sea angling along with salmon and brown trout angling, observed as the most popular categories where domestic anglers are concerned. The quality of the Irish angling product, the friendliness and hospitality of the Irish people and the country's outstanding scenery were cited amongst the principal attractions of Ireland as an international destination for recreational angling.



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The EU Water Framework Directive

As outlined in Section 3.6 of the scoping report, the EU Water Framework Directive (2000/60/EC) is recognised as a critical regulatory legislative provision. The WFD entered into force in December 2000 and requires the protection of the ecological status of surface and ground waters – this encompasses (among other elements) 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 surface water systems be protected on a catchment basis - a shared objective between all relevant public authorities. Article 5 of the 2009 Surface Water Regulations requires that a public authority, 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.

WFD monitoring has identified agricultural diffuse and point source pollution as the most significant risk to surface waters and a significant pressure in 780 (53%) of the 1,460 water bodies identified as At Risk of not meeting their environmental objective. Water quality indicators include the presence of high phosphate, nitrate or ammonium concentrations related to agricultural practices; key risks include the presence of surface-flow pathways for nutrients, chemicals (fertilizers, pesticides, herbicides etc.) and sediment to surface waters, land drainage with associated siltation, instream habitat impacted by riparian zone management and agricultural abstraction pressures.

Agri-food Strategy to 2030

IFI notes the ambition to deliver a strategy where economic, environmental and social sustainability of the agri-food sector are assured in the decade ahead and the key strategic thematic priority area of 'A climate smart, environmentally sustainable agri-food sector'. The opening statement on baseline environmental conditions however is noteworthy as follows '*Despite a number of positive actions, there has been an increase in absolute greenhouse gas (GHG) emissions over the Strategy period. In addition, ammonia emissions, which are almost exclusively from the agri-food sector, have also increased over recent years and are in breach of the limits as set out in the National Emissions Ceilings Directive. Furthermore, water quality has declined and biodiversity continues to decline, with many of the European designated sites in unfavourable condition.* As outlined in the Scoping Report, the 'Agri-Food Strategy to 2030' proposed plan and associated SEA, AA and EIA reports should fully consider and make appropriate reference to and provision for aquatic biological diversity, the fisheries resource and stakeholder interest. These documents should recognise 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, hydrological processes and regimes and broader biological diversity. In this context and



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bearing in mind State obligations to ensure sustainable development, it is advocated that such plans prioritise maintenance and restoration of ecological status in all surface waters with a particular emphasis on high quality Q5 sites and systems which have recently been flagged again by the EPA (SWMI Report 2019) as showing a worrying decline.

Climate Disruption / Biodiversity Crisis

With ambition to deliver in the context of the Strategic Framework for Public Sector Energy Efficiency, the National Adaptation Plan and most recently Ireland's Climate Action Plan (and upcoming Climate Bill), IFI has identified a number of actions and outputs under the strategic heading of 'IFI's Climate Action Framework' which will be further developed along with measures to address the Sustainable Development Goals in IFI's 'Climate Action Mandate', 2020. Plan and decision makers must take account of climate disruption / the biodiversity crisis and associated possible mitigation measures when considering any strategic plans / frameworks or proposals. As mentioned in the previous section, the measures required to achieve 'a climate smart, environmentally sustainable agri-food sector' should be fully explored and resolved, in particular in the context of increasing '*absolute greenhouse gas (GHG) emissions*' and how the agri-food strategy can contribute to reversal of this trend working toward carbon neutrality (at latest by 2050).

Specific Ecological Pressures

The potential negative impacts of any strategic plan framework on aquatic habitats should also be addressed with reference to water abstraction and other riparian zone activities, (e.g. increased abstraction and intensification of land use can have a significant negative impacts on the physical characteristics of watercourses, associated biological diversity and their riparian zones if not carefully planned and controlled). These pressures are further exacerbated by climate disruption impacts reflected in increased likelihood of drought conditions as seen in 2018 and 2020. Climate disruption is also resulting in an increasing number of 'exotic invasive species' in Irish waters. DAFM is encouraged to continue developing comprehensive biosecurity measures to safeguard the aquatic environment from harmful anthropogenic introductions and consideration of these issues should be taken in the next stage of the current SEA process.

Reasonable Alternatives

IFI advocates future development of the 'Agri-food Strategy to 2030' framework as outlined in 'Alternative 2' (Section 5.2) - to fully take account of and reflect results of the public consultation which showed strong support for an increased emphasis on environmental sustainability, particularly climate change resilience and protection of biodiversity and water quality.

Scope of the SEA

IFI endorses the selection of sustainability tropics as outlined in Section 5.4. When developing the 'Agri-food Strategy to 2030' framework further, IFI advocates consideration of the following areas in terms of potential environmental impacts with relevance to Ireland's fisheries resource (and in particular in the context of sustainability topics as outlined in the



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SEA Scoping document Table 2.2 – Ecology and Nature Conservation, Soil and Land Use, Water, Natural Capital and Climate and SEA Objectives in Table 4.1):

- Biological diversity
- Climate Disruption
- Water quality
- Surface water hydrology
- Fish spawning and nursery areas
- Passage of migratory fish / biological connectivity
- Areas of natural heritage importance including geological heritage sites
- Ecosystem structure and functioning
- Sport and commercial fishing and angling
- Amenity and recreational areas
- Sediment transport
- Alien invasive species

Concluding Remarks

The long-term environmental sustainability of any activity that may impact on the status of fish species, their habitats, fisheries and/or the recreational angling or related commercial activities that may utilise these resources is of primary concern to IFI. IFI is among the public bodies that have a role in making policies, plans or programmes relevant to surface waters in Ireland. Critical and sensitive habitats and species (both designated and otherwise) must be protected. A number of fish species and associated habitats are protected under European Directives in Ireland. From an IFI perspective, all fish species and associated habitats within its remit require protection and management for conservation and development. IFI advocates application of the precautionary principle when considering the fisheries resource in the current process. In addition, all available consideration and support should be afforded to the national 'Blue Dots Catchment Programme' which focuses on the protection or restoration of high ecological status water bodies – a vital component in fisheries ecology, freshwater ecosystems and in Ireland's aquatic biological diversity more generally.

IFI are grateful for the opportunity to have these views considered and incorporated as a component of the proposed 'Agri-food Strategy to 2030' SEA Scoping Consultation.

Should you require clarification on any of the above or require a consultation meeting please contact Brian Beckett (Director, IFI Dublin) at Inland Fisheries Ireland.

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