



Department of Agriculture, Food and the Marine

Appropriate Assessment (AA) Conclusion Statement

Agri-Food Strategy to 2030

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RSK



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1 INTRODUCTION

1.1 Background and Legislative Context

In accordance with Article 6(3) of the EU Habitats Directive (Directive 92/43/EEC) and Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011 as amended, RSK Ireland Ltd (hereafter 'RSK') has been instructed by the Department of Agriculture, Food and the Marine (DAFM) on behalf of the 2030 Agri-Food Strategy Committee to undertake an Appropriate Assessment (AA) process in respect to the proposed Agri-Food Strategy to 2030 (hereafter 'AFS').

An AA is a focused and detailed impact assessment of the implications of a strategic action (such as a plan or programme) or project, alone and in combination with other strategic actions and projects, on the integrity of any European Site in view of its conservation objectives.

This document is an AA Conclusion Statement for the AFS. It should be read in conjunction with the following documentation:

- Agri-Food Strategy to 2030;
- Appropriate Assessment (AA) Natura Impact Statement (NIS) (both published alongside this report).

1.1.1 Agri-Food Strategy to 2030

The agri-food sector is a key aspect of Ireland's economy, community and culture, exporting to at least 180 countries around the world and contributing a significant aspect of Ireland's global profile and reputation.

The AFS builds on its predecessor programmes (Food Harvest 2020 and most recently Food Wise 2025); in establishing a vision of how the sector is anticipated to develop over the period to 2030 for the benefit of its stakeholders and the wider Irish economy and environment. This is reflected in the terms of reference for the 2030 Stakeholder Committee, to outline the vision and key objectives, with associated actions, required to ensure the economic, environmental and social sustainability of the agri-food sector in the decade ahead. A key feature of each of these strategies has been the level of joint engagement by stakeholders and Government.

The backdrop to the development of the AFS takes into account the importance of the agri-food sector to the Irish economy, the contribution of primary producers to this and the consequent importance of the sector to regional and rural prosperity and employment. It also considers Food Wise 2025, including the context and environment in which it was developed, the projections that were agreed for output, export, value-added and employment growth, the five pillars of innovation, competitiveness, environmental sustainability, human capital and market development, and then a brief review of performance so far; the evolving external environment, particularly issues such as Covid-19, Brexit, EU policy changes, the natural environment including climate change, changes in the global food system, international trade developments and the emergence

of disruptive technology and the growing importance of the bioeconomy. These were set out in Appendix I of the Public Consultation Document that was issued by DAFM as part of the public consultation process in 2019.

The 2030 Committee has agreed to adopt a 'Food Systems' approach in the development of the AFS. The AFS defines a Sustainable Food System (SFS) based on the Food and Agriculture Organisation (FAO) definition as "*a food system that delivers food security and nutrition for all in such a way that the economic, social and environmental bases to generate food and nutrition for future generations are not compromised*" (FOA, 2017). This means that:

- It is profitable throughout (economic sustainability);
- It has broad based benefits for society (social sustainability);
- It has a positive or neutral impact on the natural environment (environmental sustainability).

Considering the context and the opportunities and challenges likely to face the agri-food sector in the period to 2030, the AFS has developed four main missions which will act as the anchor for the core of the AFS:

- A climate smart, environmentally sustainable agri-food sector
- Viable and resilient primary producers with enhanced well-being
- Food which is safe, nutritious and appealing: trusted and valued at home and abroad
- An innovative, competitive and resilient agri-food sector, driven by technology and talent.

Each of these sets out a mission statement and proposes a set of goals which are underpinned by a series of actions.

2 THE AA PROCESS

The process of AA was introduced under Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive), transposed into Irish domestic law through the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended in 2013. These Regulations also transpose Council Directive 79/409/EEC of 2 April 1979 on the Conservation of Wild Birds (the Birds Directive).

As recommended by the former Department of the Environment Heritage and Local Government (DEHLG) guidance (2009), the AA has also taken into account transboundary impacts where it is identified that the AFS measures have the potential to impact on Natura 2000 sites in Northern Ireland.

The guidance produced by DEHLG sets out a four stage process for carrying out AA. These stages are shown in Figure 2.1 below.

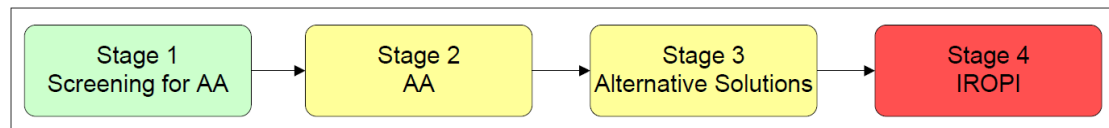


Figure 2.1: Stages in the AA Process

2.1 Screening

Screening is the process that addresses and records the reasoning and conclusions in relation to the first two tests of Article 6(3):

- Whether a plan or project is directly connected to or necessary for the management of the site;
- Whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a Natura 2000 site in view of its conservation objectives.

If the effects are deemed to be significant, potentially significant, or uncertain, or if the screening process becomes overly complicated, then the process must proceed to Stage 2 (AA). Screening should be undertaken without the inclusion of mitigation, unless potential impacts can clearly be avoided through the modification or redesign of the plan or project, in which case the screening process is repeated on the altered plan. The greatest level of evidence and justification will be needed in circumstances when the process ends at screening stage on grounds of no impact. The guidance states that the requirement is not to prove what the impacts and effects will be, but rather to establish beyond reasonable scientific doubt that adverse effects on site integrity will not result.

This stage involves identification of Natura 2000 sites and their qualifying interests and conservation objectives, as well as a review of the likely goals and actions to be included in the AFS. A preliminary impact assessment is carried out to screen the AFS's measures for the likelihood of significant effects. This process also identifies whether the AFS is

likely to have in-combination effects with other plans and programmes on Natura 2000 sites.

A Screening Statement, the main output of Stage 1 of the AA process, was produced in August 2020 and sent to the National Parks and Wildlife Service (NPWS) for consultation. The conclusion of the screening process was that the AFS, both alone and in-combination with other plans and programmes, could potentially have significant effects on Natura 2000 sites (in view of their conservation objectives) depending on where and how certain measures are implemented. As such, it was considered that a Stage 2 AA was required. The consultation response from NPWS is provided in the NIS and has been taken into account in the Stage 2 AA.

2.2 Assessment and Preparation of the Natura Impact Statement

A Stage 2 AA was carried out to consider whether the AFS alone or in-combination with other plan and programmes would have an adverse effect on the integrity of a Natura 2000 site. The assessment considered how the effect on the integrity of sites could be avoided or improved by changes to the AFS missions, goals and actions.

The NIS was then prepared based on the draft AFS prior to consultation. This considered the potential impacts arising from the proposed AFS. The AA process (undertaken in collaboration with DAFM), has successfully identified and assessed the effects of the AFS. The NIS concluded that The implementation of the measures in the final draft AFS will not have any significant adverse effects upon the integrity of any Natura 2000 site provided the mitigation identified is implemented. It is therefore not necessary to proceed to Stage 3 (Alternative Solutions).

The draft AFS, the pre-consultation NIS and the Strategic Environmental Assessment (SEA) Environmental Report were subject to public and statutory consultation from 19 April – 15 June 2021. Following this consultation, modifications and amendments were made to the draft AFS to reflect comments raised by a wide range of stakeholders as well as the mitigation proposals within the NIS.

The post-consultation NIS concluded that the AFS would not have significant adverse effects the integrity of any designated site within the Natura 2000 network.

2.3 Integration of the AA into the AFS

The AA process has been undertaken in parallel to the preparation of the AFS and SEA. This has taken the form of an iterative assessment starting with the SEA and AA team engaging directly with the 2030 Committee at an early stage to raise issues and create awareness of key considerations for the protection of the Natura 2000 network.

Mitigation measures from the AA have been adopted and worked into the actions of the Missions of the AFS. Further information on the proposed mitigation measures and how they have been integrated in the AFS is provided in Section 3.4.

2.4 Post-consultation Modification to the AFS

The public consultation process as described above has informed the development of the final strategy, with the following main changes incorporated post-consultation:

- Incorporation of mitigation measures arising through the SEA and AA processes.
- Expanded definition of what is intended by a 'Food Systems Approach'.
- Increased reference to the Common Agricultural Policy (CAP) Strategic Plan and further development of the expected relationship between this and the Strategy.
- Correction to the quantitative objectives relating to ammonia emission reductions by 2030.
- Addition of annual targets and quantified objectives for afforestation levels by 2035.
- Enhanced discussion of the environmental context within which Strategy will operate, referencing the Environmental Protection Agency (EPA) 2020 State of the Environment report, and acknowledge that the Strategy will need to contribute towards addressing some of the noted environmental challenges.
- Acknowledgement of the challenges likely to be presented to food systems by climate change and increased frequency of extreme weather events.
- Enhanced reference to the linkages between human health and sustainable diets.
- Addition of reference to the role of agri-food businesses and staff as key workers during the Covid-19 pandemic and the increased emphasis this has placed on working conditions within the sector.
- Increased discussion of the role of forestry and forestry products in providing carbon sequestration services.
- Acknowledgement of the challenges presented in some areas in achieving Ag Climatise targets in the context of increasing dairy cow numbers.
- Incorporation of additional sub-action under Mission 1, Goal 1, Action 4, relating to establishing a working group to examine the development of a Carbon Market to enable farmers monetise the benefit from carbon sequestered on their farms.
- Insertion of an additional Action to Mission 1, Goal 2: *"Input into the next National Biodiversity Action Plan, particularly on how the agriculture, forestry and fisheries sectors can contribute to the conservation and restoration of threatened habitats, species and protected areas."*
- Insertion of additional text to Mission 1, Goal 2, Action 3: *"Significant resources are being invested in this using remote sensing"*.
- Amended wording to Mission 1, Goal 3 to refer to 'protection and restoration' of surface waters.
- Incorporation of additional commitments under Mission 1, Goal 3, Action 2, relating to reduction of nutrient pollution from agriculture.

- Incorporation of additional measures under Mission 1, Goal 3, Action 3 relating to the reduction of pollution from agricultural pesticides.
- Increased emphasis on native woodlands and re-wilding under Mission 1, Goal 4, Action 3.
- Revision to Action 5 of Mission 1, Goal 4 to include ensuring that forests play a positive role in the environment.
- Insertion of two additional Actions to Mission 1, Goal 4:
 - “Work with the European Commission initiative to introduce a regulation that aims to minimize the risk that products linked to deforestation and forest degradation are placed on the EU market and to develop a definition of deforestation-free supply chains. In addition, use the EU Timber Regulation to prevent the introduction of illegally harvested timber on the EU market.”*
 - “Promote the positive role of woodlands in relation to human health and mental wellbeing. Also acknowledging the benefits of trees for animal welfare for shelter and shade.”*
- Mission 1, Goal 6, Action 6: addition of reference to food waste hierarchy.
- Mission 1, Goal 6, Action 8: addition of reference to reducing packaging in addition to making packaging more sustainable.
- Revision of text in Mission 1, Goal 7, Action 3 to specify what improvements need to be made to the evidence base from Origin Green.
- Added reference under Mission 2 to contribution of small-scale market garden horticulture to delivery of Strategy objectives, plus the role of the horticulture sector in general in providing carbon sequestration services.
- Mission 2: expanded reference to the role of organic farming in contributing to sector climate neutrality by 2050, plus added reference to the EU Organic Action Plan.
- Increased reference to horticulture as a diversification option under Mission 2.
- Addition of a new Action under Mission 2, Goal 3: *“Using Just Transition Principles, build socio-economic resilience through diversification, including by building on Action 13 of Ag-Climate, which aims to review and analyse the full suite of land diversification options that offer economic opportunities while also reducing and/or sequestering emissions (note, this will need to link closely to the actions contained in Mission 4 Goal 3 ‘Develop a Dynamic Knowledge Exchange Environment’)”*.
- Insertion of text to Mission 2, Goal 4 to highlight the importance of generational renewal.
- Increased linkage with *‘Our Rural Futures’ recommendations around local markets and local food initiatives*.
- Mission 3: addition of linkage between high quality and produce and economic viability of primary producers.

- Insertion of text to Mission 3, Goal 2, Action 4 to include continuing the work of the Anti-Parasitic Resistance Group.
- Inclusion of community agri-food initiatives in Action 3 of Mission 3, Goal 4.
- Mission 4, Goal 6: added reference to desire to prevent precarious working conditions in the sector.
- Addition of two additional Actions under Mission 4, Goal 7:
 - “Implement improvements to the management and operation of the Africa Agri-Food Programme so that future calls have enhancements to eligibility criteria and funding conditions, additionality, and due diligence.”*
 - “DAFM will align policy development and implementation with Ireland’s commitments under the SDGs taking account of specified goal targets and indicators.”*
- Increased prominence of environmental measures and dialogue and engagement in the monitoring and implementation framework, and commitment to applying any learning from Food Wise 2025.
- Addition of provisions relating to an annual ‘stock-take’ during the implementation and monitoring period to allow for updating of recommendations and actions to reflect the position as it develops.
- Enhanced definition of the role of the Environmental Working Sub-Group and its remit and responsibilities during the implementation and monitoring period.
- Increased reference of the need for monitoring to compliment that from other related programmes and strategies, most notably the new CAP and related EU programmes.

3 APPROPRIATE ASSESSMENT

In carrying out the AA for the AFS, the Birds and Habitats Regulations 2011, as amended require that the following is taken into account:

Requirement under Art. 42(11)	How has this been addressed
(a) NIS	A NIS accompanies this AA Conclusion Statement and the AFS and is published alongside this report.
(b) any other plans or projects that may, in combination with the plan or project under consideration, adversely affect the integrity of a European Site	This has been addressed in Section (4.5) of the NIS.
(c) any supplemental information furnished in relation to any such report or statement	The NIS includes information on the relevant Natura 2000 sites.
d) if appropriate, any additional information sought by the authority and furnished by the applicant in relation to a Natura Impact Statement	Consultation submissions made during the Plan preparation/AA process that was relevant to the AA have been taken into account.
(e) any information or advice obtained by the public authority	
(f) if appropriate, any written submissions or observations made to the public authority in relation to the application for consent for proposed plan or project.	
(g) any other relevant information	

3.1 Relevant Natura 2000 Sites

In line with the former DEHLG Guidelines (2009), the following sites were screened in as relevant:

- i) Any Natura 2000 sites within or adjacent to the plan or project area.
- ii) Any Natura 2000 sites within the likely zone of impact of the plan or project. A distance of 15 km is currently recommended in the case of plans, and derives from UK guidance (Scott Wilson et. al., 2006).

Natura 2000 sites that are more than 15 km from the plan or project area depending on the likely impacts of the plan or project, and the sensitivities of the ecological receptors, bearing in mind the precautionary principle. In the case of sites with water.

The missions, goals and actions of the AFS are applicable to farmers, other land-owners and fisheries (including aquaculture). It is therefore not possible to screen out any Natura 2000 sites on a geographical basis. It should also be noted that it is not feasible nor desirable to assess individual Natura 2000 sites at a national scale.

3.2 Baseline Conditions

Those sites designated as SACs and/or SPAs, collectively known as Natura 2000 sites, are the focus of the AA:

- SACs, including candidate SACs, are sites designated under the Habitats Directive, requiring the conservation of important, rare or threatened habitats and species (other than birds) across Europe;
- SPAs, including proposed SPAs, are sites designated under the Birds Directive to conserve certain migratory or rare birds and their habitats.

The conservation objectives for SACs are determined under Article 4 of the Habitats Directive and are intended to ensure that the Annex I habitats and/or Annex II species present onsite (the qualifying interests) are maintained in a favourable condition. The conservation objectives for SPAs are determined from the conservation interests of these sites.

Ireland has a significant number of internationally important habitats totalling 58 of those listed in Annex I of the Habitats Directive. Of these, 16 are deemed to be priority habitats at the national level.

As revealed in Ireland's National Biodiversity Action Plan 2017 - 2021, about 10% of the country is considered to be of prime importance for nature conservation; this comprises (in 2020) 439 SACs and 165 SPAs. Ireland's Natura 2000 sites are mapped in Figure 2 of the NIS. Six of the 439 SACs are offshore sites. According to the Interim Review of the Implementation of the National Biodiversity Action Plan 2017-2021 (Biodiversity Working Group, 2020), the conservation status of 85% of EU protected habitats in Ireland is unfavourable, while 46% are demonstrating ongoing declines in conservation status with peatlands, grasslands and some marine habitats a particular concern. For comparison, the overall proportion of protected habitats with an unfavourable conservation status in EU is 72%, showing that Ireland has a higher proportion in unfavourable status than the EU average (European Court of Auditors, 2020).

There are 68 Habitats Directive-listed species in Ireland, of which 8 are described as vagrants. Of the remaining 60 species, 57% are in favourable condition and 30% are in unfavourable condition. While 72% demonstrate stable or improving trends, 15% demonstrate a trend of ongoing decline. Population increases and range expansion have been observed for several bat species, marsh fritillary, otter and pine marten, however ongoing declines are reported for all whorl snails, freshwater pearl mussel and lesser horseshoe bat (Department of Culture, Heritage and the Gaeltacht (DCHG), 2019).

Over 60% of the 31 bird species protected through the Birds Directive that now occur in Ireland on a regular basis belong to the breeding seabird and wintering water bird groups. This has in part led to the situation that the majority (> 80%) of Ireland's SPAs are designated for these two bird groups.

A full assessment of the baseline conditions can be found in Section 3 of the NIS (published alongside this report).

3.3 Potential Effects

Agricultural, forestry and fisheries activities have the potential to detrimentally affect a wide range of habitats and species through a number of different pathways. Section 3.5.1 of the NIS discusses the how these activities effect Natura 2000 sites through a number of impact pathways including agricultural intensification, atmospheric factors, diffuse pollution of surface water and ground water, drainage, reduced breeding success or increased predation, possibly resulting in reduced population viability and inshore and off-shore fisheries.

Section 4.3 of the NIS discusses how the actions in the AFS are likely to affect the future direction of the above impact pathways. The NIS considered that the AFS provides a well-considered approach to the protection of biodiversity in Ireland and by extension, the reduction in frequency and magnitude of impacts on Natura 2000 sites and species. It was determined that, in general, positive sustainable measures were included with respect to agricultural intensification, diffuse and atmospheric pollution and fisheries. Safeguards and best practice measures, with environmental good and sustainability at its core, means that the majority of impacts from the AFS should be avoided.

3.3.1 Cumulative Effects

Cumulative impacts will be more significant for those species for which Ireland is a key area of distribution within Europe. It is considered that the AFS goes a long way to addressing the potential for such impacts, and this, in combination with additional mitigation in relation to phosphates and sedimentation (see Section 5 of the NIS), means that cumulative impacts are unlikely to occur.

3.3.2 In-combination Effects

It is considered that with mitigation measures in place it is unlikely for there to be significant in-combination effects with any of these plans on Natura 2000 sites or on the qualifying features for which these sites were designated. For example, where intensification or land use pattern may impact on a Natura 2000 site, individual appropriate assessments would be required.

3.4 Mitigation

Key areas for mitigation are in relation to the location and extent of Natura 2000 sites (i.e. where these sites lie in proximity to agricultural activities), managing agricultural intensification (including drainage), managing diffuse and atmospheric pollution and regulation and management of fisheries. The AFS addresses all these issues in some detail and provides appropriate mechanisms for reducing and counteracting impact pathways. The NIS in Section 5.1 however identifies a small number of additional measures that that would provide further reassurance in terms of mitigation. These are listed in Table 3.1 along with how they have been incorporated in the final AFS.

Table 3.1: Mitigation Proposals

Proposed Mitigation	How Mitigation has been Incorporated into the Strategy
<p>Of overriding importance is the targeting of the most appropriate measures in the most appropriate places. It is imperative that the location of Natura sites is well documented in relation to potential agricultural activities. This would include consideration of potential impact pathways at a catchment level for water bodies (oligotrophic, mesotrophic and dystrophic waters, turloughs) and at a landscape level for flowing water features (in particular, the larger river sites). It would also include consideration of mobile Annex species (particularly birds and fish) and species that use different parts of a SAC or SPA at different stages of their life cycle (or a combination of Natura habitat and non-Natura habitat). For example, there are many surface waters that are not designated, but that support Annex II fish and/or Annex I birds.</p> <p>The baseline survey of all Ireland's farms is a very good start in establishing exactly where biodiversity hotspots lie. However, it should be emphasised that this is particularly important in relation to SACs and SPAs, as these are the key sites at a European level. Therefore, knowing where an individual farm is in relation to a SAC or SPA feature is very important in order to avoid or reduce impacts from agriculture. Targeting of Natura 2000 sites by future agri-environment schemes, especially with higher level measures, also provides a high potential level of mitigation. If Natura sites can be incorporated into these schemes, this would provide a high level of protection (provided management was tailored to the individual site). All this underlines the importance of implementing the most appropriate measures in the most appropriate places with respect to Natura sites.</p> <p>All policies should first be screened prior to implementation to ensure that they are sufficiently targeted so as to avoid impacts on European sites</p>	<p>Action 1 of Mission 1, Goal 2 has been updated to emphasise importance of establishing baseline in relation to Natura 2000 sites.</p> <p>Action 2 of Mission 1, Goal 2 has been updated to include consideration of Natura 2000 sites in more targeted agri-environmental schemes.</p> <p>Action 4 of Mission 1, Goal 3 has been updated to include Natura 2000 sites.</p> <p>Additional text added to action 2 of Goal 2 in Mission 1 to address screening.</p>
<p>The strengthening of the implementation of the EIA (Agriculture) Regulations is also important in providing a further level of protection for habitats under pressure from agriculture. Any risk/s to any Natura 2000 sites as a result of new agricultural activities or enterprise should be subject to suitable environmental assessment requirements under AA and EIA (Agriculture) criteria. Best practice in this respect could be further extended to include assessment of all agricultural activities. Therefore, all new agricultural activities, changes in agricultural activities or management practice, should be cognisant and compliant with all relevant environmental legislation. Environmental legislation would include, but not be limited to, AA and EIA Agriculture Regulations</p>	<p>Action 8 of Mission 1, Goal 2 has been updated to include emphasis that of risks to Natura 2000 sites as a result of new agricultural activities or enterprise should be subject to suitable environmental assessment requirements under AA and EIA (Agriculture) criteria.</p>
<p>Throughout the AFS there is an emphasis on a move towards grass-fed systems, and the use of clover and multi-species swards. Whilst this is beneficial overall and will facilitate a reduction in GHGs and (provided it is managed) nitrogen use, it should not be at the expense of existing high</p>	<p>Action 1 of Mission 1, Goal 2 has been updated to emphasis importance of</p>

Proposed Mitigation	How Mitigation has been Incorporated into the Strategy
<p>quality (potentially Natura) sites. Again, it is a case of implementing such measures in areas where no significant negative impacts to existing semi-natural (especially Natura) sites could occur. This can be achieved through knowledge of the precise location of Natura sites in relation to farm holdings. The baseline surveys proposed for every farm holding should place particular emphasis on the location of SAC habitats and thereby ensure that these are suitably considered by any agricultural intensification or conversion to grassland systems. This would also apply to conversion to tillage i.e. no conversion of SAC habitats to tillage areas. Such measures could additionally be reinforced through the strengthening of the EIA (Agriculture) Regulations.</p>	<p>establishing baseline in relation to Natural 2000 sites.</p>
<p>Relevant studies of direct and indirect impacts should be made available to agri-environment advisors and relevant agricultural workers (including farmers), where Natura 2000 sites are present on a landholding. This should include an appreciation of appropriate buffer zones (e.g. in terms of disturbance effects on Annex II (Habitats Directive) and Annex I (Birds Directive) species. Scientific literature on habitat buffer zones should also be made available (e.g. the hydrological effects of forestry on peatlands). Training in the identification of these habitats will supplement existing in-house measures.</p>	<p>Action 1 of Mission 1, Goal 2 has been updated to include making relevant studies of potential direct and indirect impacts will be made available to agri-environment advisors and relevant agricultural workers (including farmers), where Natura 2000 sites or other high value ecological receptors are present on a landholding.</p>
<p>Disturbance effects on Annex I bird species can be controlled through the avoidance of operations in known areas during the breeding or wintering season. As is the case with other mitigation measures, where gaps are identified, these procedures should be supplemented with training in the identification of Annex I habitats and Annex II species (Habitats Directive) and Annex I species (Birds Directive).</p>	<p>Action 8 of Mission 1, Goal 2 has been updated to include specification that operations should be avoided in known areas of Annex I bird species during the breeding or wintering season in order to minimise disturbance.</p>
<p>There should be a firm commitment that the relevant authority in Northern Ireland will be consulted in all cases where transboundary effects could occur. This should apply to all agricultural projects, plans and policies.</p>	<p>Additional text added to action 8 in Goal 2 of Mission 1.</p>
<p>As a matter of good practice, mitigation should be applied to any unforeseen or uncertain effects of the Strategy.</p>	<p>Additional text added to action 1 in Goal 2 of Mission 1.</p>

4 AA CONCLUSION STATEMENT

Having considered the text of the AFS and the conclusions of the NIS, it can be concluded, for the purposes of Article 6(3) of the Habitats Directive that the adoption of the AFS would not have significant adverse effects on the integrity of any Natura 2000 sites with the inclusion of the mitigation recommendations.

5 REFERENCES

Biodiversity Working Group (2020) Interim Review of the Implementation of the National Biodiversity Action Plan 2017 -2021.

DCHG (2019) Status of EU Protected Habitats and Species in Ireland.

DEHLG (2009) Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities.

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