



Department of Agriculture, Food and the Marine

Strategic Environmental Assessment (SEA) Statement

Agri-Food Strategy to 2030

602974-04-01





RSK GENERAL NOTES

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Author	Nisha Rehm, Poppy Grange	Technical reviewer	Rob Edwards
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1 INTRODUCTION

1.1 Background and Legislative Context

Strategic Environmental Assessment (SEA) is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision making, with a view to promoting sustainable development. The process of SEA was introduced under European Directive 2001/42/EC12 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive), and came into force in 2001.

The requirements of the SEA Directive are transposed into Irish domestic law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (SI 435/2004 and SI 200/2011), and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI 436/2004 and SI 201/2011).

RSK Ireland Ltd (hereafter 'RSK') has been instructed by the Department of Agriculture, Food and the Marine (DAFM) on behalf of the 2030 Committee to carry out a Strategic Environmental Assessment (SEA) of the Agri-Food Strategy to 2030. The Agri-Food Strategy to 2030 is a voluntary, stakeholder led strategy facilitated by the DAFM. The process consists of four main components.

- The preparation of an Environmental Report, where the likely significant effects of the Strategy are identified and assessed. The Environmental Report is the principal document in the SEA process and summarises the likely effects of the Strategy on the environment, and measures which would mitigate any significant adverse effects.
- A consultation on the Environmental Report and Strategy with the public, statutory environmental bodies, and any other EU Member State which might be affected.
- The consideration of the findings of the Environmental Report and the consultation process in deciding whether to adopt or modify the draft Strategy.
- The publishing of the decision to adopt the Strategy and how the SEA process influenced the final outcome.

The Strategy was published on 16 July 2021. As such in accordance with Statutory Instrument No 436/2004 (as amended), a statement is required to be prepared providing information on this decision (the "SEA Statement").

1.2 Summary of the SEA Process

The SEA followed the approach set out in Table 1.1 below, which was based on guidance were produced by the Government of Ireland in 2004, updated through the EPA Pack, most recently in 2020.

Table 1.1: Stages in the SEA Process

Stage	Tasks
Pre-review	If SEA is not mandatory, screen for possible significant environmental effects
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope Initial public consultation	Step 1: Describe briefly the statutory purpose, geographic area, population, and timeframe of the plan, and its relationship (both vertical and horizontal) with other plans/programmes.
	Step 2: Summarise the main findings of the survey and analysis stage.
	Step 3: Describe in general terms the current state of the physical environment of the area, with particular reference to (a) areas of environmental importance (such as protected sites); and (b) areas experiencing environmental problems (such as waste, or air or water pollution) at present. Describe how that environment would be likely to evolve on the basis of current development trends but no change in current policies.
	Step 4: Define (a) broad planning policy objectives for the area based on Steps 1 and 2; and (b) relevant environmental policy objectives for the area taking account of national policy and any relevant international legal obligations (e.g. EU Directives).
	Consult the Consultation Bodies on the scope of the SEA.
Stage B: Developing and refining alternatives and assessing effects Stage C: Preparing the Environmental Report	Step 5: Identify a number of reasonable alternative development strategies for the area which are capable of fulfilling the policy objectives established in Step 4.
	Step 6: Evaluate these alternative strategies against the chosen planning and environmental policy objectives (step 4), with a view to establishing the most sustainable option.
	Step 7: Select the preferred strategy (which may combine elements of different strategies), stating reasons for the choice, and work it up with detailed policy objectives.
	Step 8: Carry out an environmental assessment of the preferred strategy to determine whether implementation would be likely to cause any significant effects on the environment (in particular, the aspects listed in Annex I of the SEA Directive, such as biodiversity, air, cultural heritage, etc.).
Stage C: Preparing the Environmental Report	Step 9: Modify the preferred strategy to eliminate, reduce or offset any significant adverse effects, as appropriate.
	Step 10: Propose monitoring measures in relation to any likely significant environmental impacts.
	Step 11: Prepare a non-technical summary.
Stage D: Consulting on the draft plan or programme and the Environmental Report	Consult the public and Consultation Bodies on the draft plan or programme and the Environmental Report.
	Assess significant changes.
	Make decisions and provide information.
	Develop aims and methods for monitoring.

Stage	Tasks
Stage E: Monitoring the significant effects of implementing the plan or programme on the environment	Respond to adverse effects.

Interaction between the 2030 Committee, DAFM and RSK to prepare the Scoping Report (end of Stage A), the Consultation Environmental Report (end of Stage C) and the final Environmental Report (end of Stage D) was an iterative process. The consultation phases on these documents with statutory environmental authorities (“Consultation Bodies”), the public, and other EU Member States were more formal in nature and are described in Section 3 below.

1.3 Purpose of the SEA Statement

The main purpose of the SEA Statement is to document how environmental considerations, the views of statutory consultees, and other submissions received during the consultation stages have been taken into account during the preparation of the Agri-Food Strategy and related monitoring measures.

Upon adoption of the Strategy, the SEA Statement must be made available to the Consultation Bodies, the public, and where relevant other EU Member States in relation to any transboundary consultations. The SEA statement includes a summary of the following:

- How environmental considerations were integrated into the Strategy;
- How submissions and observations made to DAFM, consultation outcomes, and the Environmental Report were integrated into the Strategy;
- The reasons for choosing the Strategy as adopted, in the light of other reasonable alternatives considered; and
- The measures decided upon to monitor any significant adverse effects, as well as any potential unforeseen adverse effects arising from the implementation of the Strategy.

2 SUMMARY OF HOW ENVIRONMENTAL CONSIDERATIONS WERE INTEGRATED INTO THE STRATEGY

2.1 Introduction

Environmental considerations were integrated into the Agri-Food Strategy through the SEA process, which was carried out in parallel with the drafting of the Strategy. Results from the different stages of the SEA process were fed back to the 2030 Committee and DAFM through the draft reports and presentations by the SEA team at 2030 Committee meetings.

2.2 Environmental Baseline

An analysis of baseline information has been carried out to provide an evidence base for current and likely future environmental conditions without the Strategy. Key environmental and sustainability issues for Ireland have also been identified. This process has been undertaken to identify any potential environmental sensitivities or constraints which need to be taken into consideration in the preparation of the Strategy.

Information for this section has been obtained from Government websites such as those of the National Parks and Wildlife Service (NPWS) and the EPA; the 2020 EPA report 'Ireland's Environment' and other documents as referenced in the Environmental Report.

The environmental sensitivities were mapped (Appendix C of the Environmental Report) and strengths, weaknesses, opportunities and threats identified for each of eleven sustainability topics. These were fed back to the 2030 Committee through the draft Scoping Report and draft Environmental Report.

The environmental baseline conditions along with responses received during consultation on the Scoping Report and review of other relevant plans and programmes, led to the identification of a number of SEA objectives.

2.3 Preparation of the Environmental Report

The Environmental Report was prepared to carry out an evaluation of the likely environmental effects of the implementation and non-implementation of the Strategy.

The draft Strategy was assessed against the SEA objectives. These objectives were used within high level and detailed assessment matrices to ascertain the magnitude of likely effects, the sensitivity or value of the receiving environment (including people and wildlife) and thus the significance of effects of the Strategy goals and actions.

Assessments of alternatives to the Strategy as a whole have been undertaken, along with an assessment of likely cumulative effects of objectives within the draft Strategy and likely in-combination effects of the draft Strategy with other plans and programmes.

The results of the assessment are detailed in the Environmental Report and these have been fed back to the 2030 Committee and DAFM through the draft report and presentations at 2030 Committee meetings.

2.4 Mitigation Measures

Annex 1 of the SEA Directive requires the Environmental Report to set out ‘the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme’. The SEA process identified some uncertain/adverse effects on the environment of the proposed Strategy being implemented. To ensure that these identified adverse effects are minimised, a number of potential mitigation measures were proposed.

Table 2.1 and Table 2.2 detail how the proposed mitigation measures have been integrated into the Strategy.

Table 2.1: Proposed Mitigation Measures

		Proposed Mitigation in the SEA ER	How Mitigation has been Incorporated into the Strategy
Mission 1: A Climate Smart, Environmentally Sustainable Agri- Food Sector			
Mission 1, Goal 1, Action 7	Scale up renewable energy (RE) sources, especially anaerobic digestion and biorefining, and solar PV and energy efficiency.	<p>Whilst positive in many aspects, increased renewables deployment if not adequately regulated may present adverse effects on species, habitats, landscape and cultural heritage. Local planning controls already provide a means of regulating such effects and hence the Environmental Working sub-Group should monitor the rate of new applications over the Strategy period and will engage with decision making bodies to establish the extent to which decisions reflect and take account of such issues. If the need is identified, additional planning guidance will be issued to authorities.</p> <p>Assessment should be carried out for developments near protected or sensitive sites. Appropriate inter-planting, wildlife corridors and boundaries to be considered where appropriate.</p> <p>Landscape is important to Irish tourism and cultural heritage. Careful consideration of scale and siting of developments should be taken. Shrubs and trees can be used to screen certain developments. Wildlife corridors should be maintained and enhanced.</p>	Action 7 has been updated to include mitigation recommendations.
Mission 2: Viable and Resilient Primary Producers with Enhanced Well-Being			
Mission 2, Goal 1, Action 8 (Dairy)	Continue the move to higher-quality, value-added dairy produce, positioning Irish dairy as a premium grass-fed product.	Environmental performance of the product should form a component of 'premium' status, linked to adoption of Origin Green measures with a particular emphasis on reducing carbon and GHG emissions and effective management and reduction of emissions to water and air.	Update made to Action 8 to include strong environmental credentials.

		Proposed Mitigation in the SEA ER	How Mitigation has been Incorporated into the Strategy
		Focus of Strategy supported R&D activities should include initiatives relating to improving the sustainability and environmental performance of the livestock sector.	In relation to R&D activities, this is already included, see Mission 1 Goal 1 Actions 5 and 6.
Mission 2, Goal 1, Action 12 (Beef and Sheep)	Promote Irish Grass-Fed beef and lamb as premium products, nationally and internationally.	As above. Further research should be supported to establish sustainable levels of grazing in designated sites and other environmentally sensitive areas.	Update made to Action 9 of Mission 1, Goal 2, to include this mitigation recommendation.
Mission 2, Goal 1, Action 20 (Pig and Poultry)	Develop the sector both in terms of domestic market share for Irish-produced product and new export markets.	There is currently uncertainty around what this measure entails in practice. Monitoring should therefore be carried out to establish if new pig and poultry units established over the Strategy period exceed what would be expected due to baseline trends. New units developed over the plan period should be encouraged to adopt high standards of emissions reduction and control particularly around emissions to air and water and GHG emissions. This could include promotion of BAT requirements for all sites, not just those requiring an IED licence (required for intensive pig and poultry units above a certain size). The effectiveness of local planning controls in ensuring appropriate siting of intensive units should be researched and if need be additional guidance will be issued to decision-making bodies.	The committee considers that this action is not focused on encouraging or calling for increased output or more pig/poultry units. It is instead focused on growing market share for pig and poultry products coming from Irish farms, to displace imports. This does not require increasing farm output. Therefore, it is not proposed to incorporate this mitigation action.
Mission 2, Goal 1, Action 27 (Tillage)	Stakeholders will work to develop the sector to take advantage of potential growth.	Proposals to grow output from the tillage and cereals sectors should focus on increased productivity from existing arable land. Conversion of extensive or biodiversity rich permanent pasture should be discouraged unless it can be demonstrated to be not damaging to biodiversity, soil, water and other environmental parameters.	Update made to Action 27 and Action 28 of Mission 2, Goal 1, to include mitigation recommendation.

		Proposed Mitigation in the SEA ER	How Mitigation has been Incorporated into the Strategy
		Implementation of this action should seek to synchronise with the objectives of the National Soil Strategy as referred under Mission 1.	
Mission 2, Goal 1, Action 32 (Horticulture)	Develop a strategy.	At this stage there is uncertainty over what this action will entail beyond development of a Horticulture Industry Strategy. It is suggested that this strategy should seek to carry forward the environment and sustainability focus of the Agri-Food Strategy, particularly around the key themes of emission reduction, restoration of biodiversity and carbon neutrality.	Update made to Action 32 to include this mitigation recommendation.
Mission 3: Food that is Safe, Nutritious and Appealing, Trusted and Valued at Home and Abroad			
Mission 3, Goal 3, Action 3	The food and beverage industry should take advantage of digital innovations and artificial intelligence (AI).	Measures to support AI adoption in the sector should not disadvantage SME producers, processors and marine businesses. AI uptake measures should be accompanied by re-training and education initiatives to support the transition and re-skilling of jobs lost or threatened by AI and automation.	Update made to Action 3 to include this mitigation recommendation.
Mission 3, Goal 3, Action 4	Industry will use R&D and innovation to progress reformulation of energy-dense and nutrient poor processed foods to reduce the level of disadvantageous components.	Measures to support R&D should not disadvantage SME producers, processors and marine businesses.	This committee response to this mitigation measures states that the action calls on industry in general to carry out R&D and innovation. It does not single out any particular business size. Therefore the mitigation action is not deemed necessary.
Mission 3, Goal 4, Action 3	Increase efforts to gain and maintain market access for key products to key international markets.	Measures that result in increased export food miles should be accompanied by measures to promote domestic carbon offsetting particularly in on-farm environments such as woodland recreation, plugging emissions from carbon rich soils and protection and restoration of peat soils.	Transport has been shown to only account for around 4.8% of global food system GHG emissions (which is about the same as retail). The offsetting measures suggested are included in the Strategy (Mission 1, Goals 1, 2 and 4 in particular).

		Proposed Mitigation in the SEA ER	How Mitigation has been Incorporated into the Strategy
Mission 4: An Innovative and Competitive Agri-Food Sector, Driven by Technology and Talent			
Mission 4, Goal 4, Action 5	Labour-saving automation research and development, including a focus on advanced manufacturing, should be pursued.	Measures to support AI adoption in the sector should not disadvantage SME producers, processors and marine businesses. AI uptake measures should be accompanied by re-training and education initiatives to support the transition and re-skilling of jobs lost or threatened by AI and automation.	Update made to Action 5 to include this mitigation recommendation.

Table 2.2: Proposed Cross Sector Mitigation and Enhancements

Proposed Cross Sector Mitigation and Enhancements	How Mitigation has been Incorporated into the Strategy
Development of sector-wide strategy to tackling the issues relating to surface water pollution from agricultural sources.	Reference to surface water included in Mission 1, Goal 3, Acton 2.
Promotion of cross-boundary exchange of best practice with Northern Ireland based stakeholder.	This is already stated in Mission 4 Goal 1 Action 2. Additional text has been added to the Executive Summary to highlight exchange of best practice
Consultation should take place with relevant authorities within Northern Ireland where uncertain or adverse effects have been identified and may become transboundary.	Text added to NI measures 5.3 – comments re role of Monitoring group function plus updates to data sources in tables 5.1 and 5.2 the function for the HLIC in the Monitoring and Implementation chapter
Development of measures to focus ecological and soils restoration objectives under Mission 1 on the areas of greatest degradation and need.	Update made to Action 9 of Mission 1, Goal 2 to include recommendation.

Proposed Cross Sector Mitigation and Enhancements	How Mitigation has been Incorporated into the Strategy
Further examination of the findings of the MacKinnon report into woodland planting and development of a sector wide response (expected to form part of Project Woodland as referred to in Mission 1, Goal 4).	This is already implicit in Mission 1 Goal 4 Action 1.
Further research into opportunities presented by afforestation such as the use of certain tree species to minimise air pollution.	This is considered too specific for inclusion of the 2030 Strategy, it would be more appropriate in the dedicated new forestry strategy. In any event, revisions to Mission 1 Goal 4 action 5, and the inclusion of a new Action (no. 8) also address this point.
Enhanced Forest Service oversight when/where forestry related operations are planned in high status catchments.	Update made to Action 2 of Mission 1, Goal 3 to include this recommendation.

3 SUMMARY OF HOW SUBMISSIONS, OBSERVATIONS AND CONSULTATIONS WERE INTEGRATED INTO THE STRATEGY

3.1 Introduction

Consultation has been carried out on the Strategy and the SEA throughout its preparation. Table 3.1 below summarises the various consultation exercises undertaken.

Table 3.1: Consultation Dates

Date	Consultation
31 July – 1 October 2019	Initial public consultation
11 August – 8 September 2020	SEA scoping consultation
19 April – 15 June 2021	Public consultation on draft Strategy and ER

3.2 Initial Public Consultation on the Strategy

Initial public consultation on the Agri-Food Strategy was carried out in 2019 to ascertain the views of stakeholders on the direction of the sector to 2030 and the strategic actions required to ensure the Strategy lives up to its potential, as well as societal expectations. The public consultation included a response form for respondents to complete as well as an online survey. Approximately 60 submissions were received and 214 respondents took part in the online survey.

3.3 SEA Scoping Consultation

The SEA Directive requires authorities with “environmental responsibilities” (hereafter referred to as the Consultation Bodies) to be consulted on the scope and level of detail of the information which must be included in the Environmental Report (Article 5(4)). The Directive does not require full consultation with the public or bodies other than Consultation Bodies until the Environmental Report is finalised.

Initial informal contact was made with the Consultation Bodies in July 2020 to notify them of the drafting of the Strategy and the SEA and AA, and to elicit advice on what should be covered in the SEA, key environmental issues being faced by Ireland and relevant information sources to guide the SEA.

The Scoping Report was issued to the Consultation Bodies on 11 August 2020 for formal scoping consultation. This included:

- the Environment Protection Agency (EPA);

- Department of Housing, Local Government and Heritage (DHLGH)¹;
- Department of the Environment, Climate and Communications (DECC)¹;
- Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media¹; and
- DAFM.

Due to the potential of transboundary effects, it also included the Northern Ireland Environment Agency (NIEA). The Scoping Report was also published on the DAFM website for a wider non-statutory public consultation to encourage further participation by stakeholders and the public.

Consultation Bodies must provide a view, once consulted, within four weeks. Responses were received from DECC, Department of Housing, Planning and Local Government, DAFM, EPA and NIEA². Consultation responses were also received from members of the public, including a number of organisations. Consultation responses on the Scoping Report are reproduced in Appendix A, along with a comment on how they have been accounted for in the preparation of the Environmental Report. The scoping consultation comments were taken on board in the production of the Environmental Report resulting in:

- Additional plans and programmes reviewed;
- Additional baseline information added;
- Amendments made to the proposed SEA objectives and sub-objectives;
- Additional guidance reviewed;
- Alternatives reviewed and reworded;
- Points raised taken into consideration during the impact assessment; and
- Recommendations taken into consideration in development of the mitigation and monitoring measures.

3.4 Consultation on the Draft Strategy and Environmental Report

The Environmental Report and draft Strategy, as well as the Appropriate Assessment (AA) Natura Impact Statement (NIS), were presented for public and statutory consultation over the period from 19 April – 15 June 2021. The purpose of this stage was to give the public and the Consultation Bodies an opportunity to express their opinions on the findings of the Environmental Report, and to use it as a reference point in commenting on the draft Strategy.

In order to facilitate further consultation on the SEA and the AA, a webinar was hosted by RSK on 8 June 2021. The webinar provided an introductory presentation on the Strategy development, followed by presentations on the assessment results of the SEA and AA. The presentations were followed by a question and answer session. Over 50 people attended the webinar.

During the webinar three polls were held to gather feedback from the webinar attendees:

- In what capacity are you attending today's event?

¹ Note that at the time of the Scoping consultation the previous Department names applied, those stated here reflect the updates that occurred in late 2020.

² Respondent Department names referred as they were at the time of the scoping consultation.

- Is there more than can be done in the final Strategy to deliver economic, environmental and social sustainability of the sector?
- Do you agree with the outcomes of the SEA and AA processes?

The first poll sought to identify in what capacity the attendees were taking part in the webinar. Of the 23 attendees that responded to the poll, the majority were from a statutory consultee or other government department (52%), followed by industry body (22%) and environment NGO (17%). The remaining were from an academic body and other or personal interest.

The second poll was taken following the presentation on the Strategy development and sought to elicit feedback on the Strategy. Of the 37 attendees that responded to the poll, 41% felt that it could have more of an environmental sustainability focus while 38% felt that it achieves a good balance. A small number of respondents felt that the Strategy should have a greater focus on economic or social sustainability.

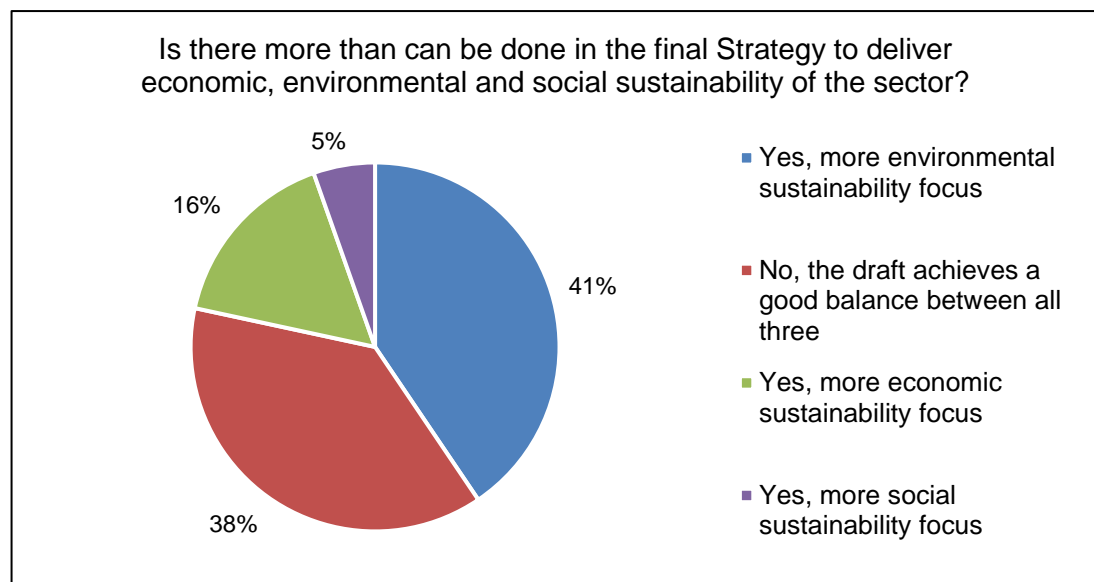


Figure 3.1: Outcomes of the Second Poll

The final poll question sought to elicit opinion on the results of the SEA and AA. Of the 30 respondents to the poll, a high proportion agreed (47%) with the outcomes of the SEA and AA process than those that disagreed (33%). Around 20% said that they did not know.

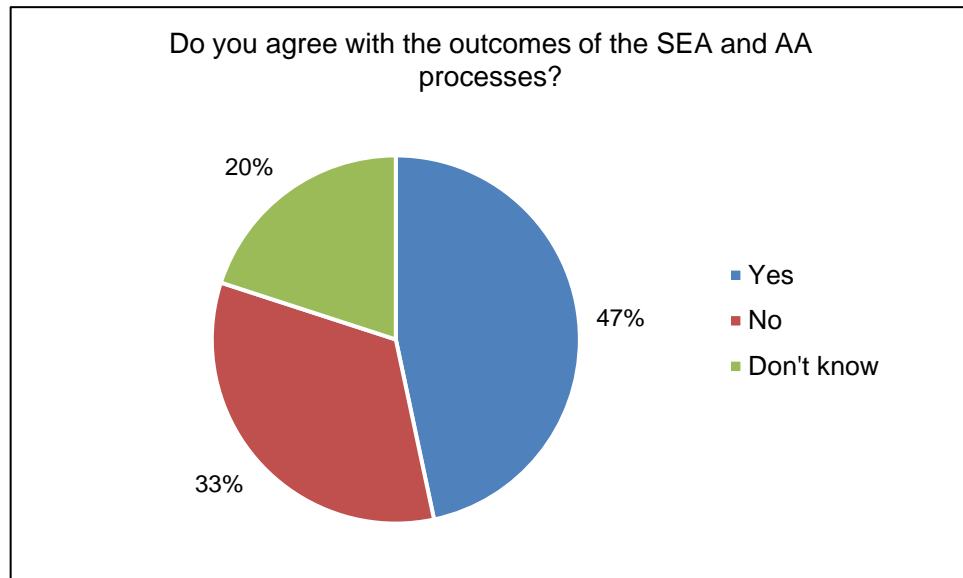


Figure 3.2: Outcomes of the Third Poll

A number of attendees posted questions for the Q&A session. While some of the questions sought clarification on the process for carrying out the SEA and consultations, others questioned the outcomes of the SEA and the environmental impacts of the Strategy. Some of the main themes of the questions included:

- Whether the Strategy would enable legal obligations and environmental targets to be met (in relation to nitrates, water, ammonia and climate change);
- The assessments and science underpinning the Strategy;
- Whether payments or incentives will be used;
- How biodiversity improvements will be made;
- Impacts from increased agricultural output;
- Impacts from intensive agriculture;
- Ammonia impacts;
- Carbon offsetting;
- Overfishing;
- Monitoring arrangements; and
- How to address monitoring and mitigation shortcomings of Food Wise 2025.

The statutory Consultation Bodies were the same as those listed in Section 3.3 above. Responses were received from:

- DECC (Geological Survey Ireland and Inland Fisheries Ireland);
- DAFM (Sea Fisheries Policy and Management Division);
- EPA;
- DHLGH (NPWS); and
- NIEA.

Feedback from the public consultation was gathered through an online questionnaire as well as submissions sent by email or post. The online questionnaire asked the following questions:

Q1. Do you have any observations on the conclusions in the Environmental Report and Natura Impact Assessment?

Q2. Having reviewed the Environmental Report, please provide comments on individual sections in more detail. Please ensure to state clearly the section of the Environmental Report and page number (if relevant) that your comment or submission relates to.

Q2. Having reviewed the Environmental Report, please provide comments on individual sections in more detail. Please ensure to state clearly the section of the Environmental Report and page number (if relevant) that your comment or submission relates to.

Q4. Is there any additional information which in your view should be considered in the Environmental Report and/or the Natura Impact Assessment? Please specify.

Q5. Are there additional mitigation/monitoring measures that you would like to propose? Please specify.

Q6. If you wish to make comments on the draft 2030 Agri-Food Strategy, please ensure to state clearly the section of the draft Strategy and page number (if relevant) that your comment or submission relates to.

Ninety-one public consultation submissions were received. While most of the public consultation comments related to the draft Strategy, a number provided comments on the SEA Environmental Report and NIS as well.

In line with the SEA Directive and SI 435/2004, comments from these bodies, members of the public, and other stakeholders were duly noted and considered, and if appropriate addressed in the final Strategy document. The consultation responses are reproduced in Appendix B, along with a comment on the action taken in response to the comments within the Environmental Report. In response to the consultation comments, the following changes were made to the Environmental Report:

- Change made to the SEA sub-objectives;
- Additions made to baseline data;
- Additions/clarifications made to the assessment;
- Additions made to cross sector mitigation and enhancements.

Appendix C includes a summary of the public consultation submissions as they relate to the draft Strategy. It does not purport to represent all of the opinions and suggestions in the submissions. Rather, it is designed to offer a flavour of some of the common themes that arise in the submissions and a sample of the suggestions made.

The main theme of the public consultation comments relating to the SEA process are summarised below.

Monitoring

A number of comments related to the provision for monitoring within both the SEA process and the Strategy. These responses frequently noted the acknowledged shortcomings of the monitoring process for Food Wise 2025. These responses have been noted by the 2030 Committee and the monitoring section of the Strategy has been strengthened, with that information reflected in this SEA Statement. An Environment

Working Sub-Group is being established to take responsibility for monitoring and reporting during the implementation period, accounting for the lessons learnt during the equivalent stage of Food Wise 2025.

Alternatives

The alternatives considered in the SEA process are those defined by the 2030 Committee as meeting the tests established by the EPA guidance of being ‘realistic, viable and implementable’. The role of the SEA is to assess the alternatives that were identified applying these tests and hence it is considered that the process has correctly applied the required process in assessing alternatives.

Several observers noted that Alternative 2 was identified as the best performing environmental and therefore queried why this had not been adopted by the 2030 Committee. There is no obligation on the managing authority to adopt the best performing environmental option providing that the adoption of the preferred option can be justified taking into account all factors.

Assessment Outcomes

Several responses stated dis-agreement with the SEA assessment outcomes, either generally or in respect to specific aspects of the Strategy. It is acknowledged that SEA is a high-level process with reliance on expert judgement and hence there is scope for differing opinions on assessment outcomes to reflect the standpoint of the observer. The SEA team is satisfied that the assessment process has been completed robustly and objectively, following standard methodologies that accord with relevant guidance and which have been accepted by statutory bodies on other equivalent strategies in Ireland. The monitoring measures discussed will provide a means of verifying the assessment outcomes in the future and should any additional unforeseen effects be identified during this period, this will provide opportunity to identify and implement additional mitigation measures.

Mitigation

The mitigation measures proposed through the SEA process relate to the assessment outcomes as referred above and hence similar considerations apply. The final publication version of the Strategy has applied over 100 modifications from the consultation draft to reflect a combination of the SEA and AA outcomes and the consultations responses. The majority or all of these modifications are focused on strengthening the environmental performance of the Strategy.

Consultation Process

Several observers commented on the lack of opportunity to engage with the Strategy development or SEA processes at an earlier stage and also note the limitations presented by running consultations online only. The consultation exercises conducted through both the SEA and Strategy programmes are described in this document and are considered to meet and exceed the required standards. It is acknowledged that online only events can restrict direct one-to-one engagement in comparison with equivalent face-to-face forums but the Strategy and SEA processes have coincided almost entirely with the Covid-19 pandemic and therefore have been required to work within the limitations presented by Government guidance in terms of the arrangement and hosting of public events and meetings,

Comments on Strategy Content, Goals and Actions

All consultation responses relating the Strategy have been reviewed and considered by the Managing Authority and are reflected as appropriate in the final publication version of the Strategy.

3.5 Transboundary Considerations

The potential for transboundary effects was identified in relation to Northern Ireland. As described above, the NIEA was consulted as part of the scoping and public consultation stages of the SEA. The Northern Ireland Loughs Agency was also consulted as part of the public consultation stage, but no response received.

3.6 Post-consultation Modification to the Strategy

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 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 it’s 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.

4 CONSIDERATION OF ALTERNATIVES

4.1 Introduction

Consideration of alternatives is a key feature of the SEA process as defined by the SEA Directive and the SEA Regulations. In practical terms, it refers to possible alternative mechanisms for delivering the goals of the Agri-Food Strategy, and the assessment of the impacts of each of these options against the SEA objectives.

The recommended approach to consideration of Alternatives is addressed in the EPA Research Report; *Developing and Assessing Alternatives in Strategic Environmental Assessment* (EPA, 2015).

SEA guidance recognises that it is not for the SEA to decide on the options to be considered. This SEA therefore focuses on the alternative delivery options actually considered in the preparation of the Agri-Food Strategy by the 2030 Committee, and with reference to the previous 2025 Food Wise SEA process.

4.2 Outline Summary of Alternatives Considered

Three alternatives were identified, which are described below.

Alternative 1: Base Case ‘Do Nothing’

This alternative is representative of what would likely happen in the absence of a new strategy. The base case is assumed to comprise continuation of the output seen in recent years; including that the dairy herd continues to increase and the suckler herd continues to decrease slowly.

Alternative 2: Greater Emphasis on Reduced Output

This alternative assumes that the focus of the strategy should give greater priority to the environmental strand of sustainability; even if this results in reduced output, with implications for the social and economic strands.

Alternative 3: Balanced Approach

This alternative assumes an increased focus on all three strands of sustainability - environmental, economic and social. This involves taking elements of both improved environmental sustainability to deliver on the 2030 climate ambition and put the sector on a trajectory towards a climate neutral economy by 2050; in combination with measures to increase prosperity and value-add, with any increased output value in beef and dairy coming from within the existing herd. This alternative also takes a food systems approach that considers the connections of the food system with nutrition, health and the environment.

4.3 Assessment of Alternatives

A high level matrix assessment has been carried out on each of these three alternatives to determine how well each of the respective measures perform against the SEA Objectives.

Alternative 1 performs least well when assessed against the SEA objectives. This alternative is a 'Do Nothing' scenario which means that the current Food Wise 2025 Strategy would continue, which would see agricultural practices continue on the current trajectory with dairy herds increasing and suckler herds decreasing slowly. This is predicted to result in strong adverse effects in terms of the environmental SEA objectives because it means that the current trends in declining biodiversity, water quality and increased air pollutants are likely to continue.

Alternative 2 places greater emphasis on the environmental strand of sustainability, even if this results in reduced output. The outcome of these actions would be beneficial for many of the environmental SEA objectives, with strong beneficial effects predicted for biodiversity, flora and fauna, water, air quality and climate. However, it is anticipated that there could be adverse effects on population and human health. Overall this alternative performs better in terms of the environmental SEA objectives than both Alternative 1 and 3. However, out of all the alternatives it performs least well in terms of population and human health.

Alternative 3 would take a more balanced approach which assumes an increased focus on all three strands of sustainability - environmental, economic and social. These three aspects of sustainability interlink strongly, meaning it is likely that beneficial effects will occur across the majority of the SEA objectives.

4.4 Reasons for Selection of Chosen Alternative

Alternative 3 represents the chosen strategic alternative, developed by the 2030 Stakeholder Committee. This is on the basis that Alternative 3 provides a balanced approach which covers all three strands of sustainability - environmental, economic and social. This best aligns with the terms of reference of the 2030 Committee which was *"The strategy will 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."* Although Alternative 2 is predicted to have stronger beneficial effects on a number of the environmental SEA objectives when compared to Alternative 3, it performs worse in terms of the population and human health objectives. Through careful consideration of the three alternatives it has been determined that implementation of Alternative 3 would be the preferred option to replace the current Food Wise 2025 Strategy.

5 MONITORING FRAMEWORK

5.1 Statutory Requirement

Article 10 of the SEA Directive requires the Managing Authority, to monitor significant environmental effects of implementing the Strategy. This must be done in such a way as to also identify unforeseen adverse effects and to take appropriate remedial action. Monitoring should commence as soon as the programme is adopted, with annual reporting carried out for the life of the programme. It may be necessary to revise the monitoring programme periodically so that it takes account of new methods and increased understanding of the baseline environment.

It is important that any monitoring proposed by the SEA should aim to specifically monitor the impact of the Strategy rather than monitoring trends in the baseline environment that would have occurred regardless. In accordance with the Ireland SEA Regulations, monitoring should also focus on aspects of the Strategy where environmental impacts are predicted to be significant (or uncertain). However, the SEA did not predict any significant adverse effects of the Strategy being implemented.

Further guidance on monitoring is provided by the EPA publication: *Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring* (Gonzalez, Therival, Gaughran and Bullock, 2020). This document includes the following main recommendations relating to development of monitoring indicators, which have been referred to in the development of the monitoring proposals contained with the Strategy and as summarised in this SEA Statement.

- *meaningful indicators;*
- *how often the indicators should be monitored (i.e. frequency);*
- *who should carry out the monitoring (i.e. responsibilities);*
- *thresholds/targets/trigger levels above which remedial action is required;*
- *what the remedial action should involve and who is responsible; and*
- *inclusion of a commitment to reporting on monitoring findings.*

5.2 Monitoring Arrangement

The Strategy implementation will be overseen by a High-Level Implementation Committee (HLIC) chaired by the Minister for Agriculture, Food and the Marine, and its key tasks will be to ensure the delivery of the four Missions and to review the annual environmental monitoring report to ensure progress towards achieving the Strategy's high-level environmental targets, consider any significant environmental effects arising and agree what remedial measures will be put in place should negative environmental trends be identified as a result of implementation of the Strategy.

While the composition and precise terms of reference of the HLIC will be established by the Minister, each Mission will be considered at least once annually by the HLIC, which may also decide to focus on particular issues or priorities. There will be an annual review of implementation and, where appropriate, the missions, goals and actions may need to

be reviewed in light of changing circumstances within the sector or the evolving policy environment, in line with learning's from the implementation of Food Wise 2025.

As recommended by the EPA guidance, monitoring should reflect the predicted significant adverse effects of the Strategy. However, in this case it is also considered that there needs to be an increased focus on potential unforeseen effects due to the national remit and wide-ranging nature of the Strategy. In this regard, SEA monitoring should reflect the nature and level of detail of the plan/programme and aim to specifically monitor the impact of the Strategy. An effective monitoring framework is an essential part of the Strategy implementation process. In an effort to strengthen monitoring, there is a need to have regard to the recommendations from the Food Wise Environmental Sustainability Committee which expressed concern relating to trends in greenhouse gas (GHGs), water quality, air pollutants and biodiversity indicators. That Committee also identified that future policy should focus on developing the right measures in the right area, while acknowledging that capacity to reduce emissions (GHG and ammonia) is limited, and ongoing close monitoring is required as part of the next Strategy. One of the key recommendations made by the Committee was that any future strategy should include flexibility to allow for an annual stock-take/analysis to allow updating of recommendations and actions to reflect the position as it develops. In this way, the goals and actions of the Strategy can be modified to reflect emerging environmental trends if indicated by the monitoring. This provides a means of remediating any unforeseen environmental effects.

An Environmental Working Sub-Group will be established to oversee monitoring, review and reporting of environmental issues within the confines of this Strategy. This group will report annually to the HLIC and while its composition will be determined by the Minister, it is expected to include representation from relevant government departments and agencies covering the breadth of environmental issues identified in this Strategy. The functions of the group will include:

- Monitor the indicators as set out in the SEA Statement, including the key environmental parameter indicators, set out data sources and identify any additional monitoring indicators deemed appropriate.
- A particular focus will be applied to the broad environmental trends which the Strategy seeks to influence, primarily; biogenic methane, ammonia emissions, agricultural nutrient losses to water, farmed areas prioritised for biodiversity, increased afforestation, increased marine protected areas, organic farming uptake and food waste reductions.
- In line with the recommendation of the Food Wise Environmental Sustainability Committee and consultation feedback, indicators should be outcome focused, activity based and SMART (Specific, Measurable, Actionable, Realistic and Time-bound), where possible. Where information gaps are identified, these will be highlighted in order to improve availability of information to inform future strategies.
- Identify thresholds/targets/trigger levels above which remedial action is required.
- Consider cumulative effects in addition to positive and negative effects.
- Determine the frequency of monitoring and report on findings.
- In line with the Directive, existing monitoring arrangements should be used where appropriate, in order to avoid duplication of monitoring. Synergies with reporting required under the new CAP and other policies such as the EU Farm to Fork and Biodiversity Strategies should be exploited.

- Strategy-related implementation reports should be aligned with the environmental monitoring required under SEA legislation. This will enable the environmental performance of the Strategy to be evaluated and allow negative trends to be identified early and remedial action and responsibilities to be determined. It will also provide for increased transparency during implementation.

5.3 Monitoring Indicators

A range of potential indicators that could be monitored were developed during the SEA process and were suggested in Section 8 of the Environmental Report. Section IV of the Monitoring and Implementation Framework of the Strategy sets out that one of the functions of the newly established Environmental Working Sub-Group should be to monitor the indicators as set out in the SEA Statement, including the key environmental parameter indicators, set out data sources and identify any additional monitoring indicators deemed appropriate.

Many of the proposed indicators overlap with those proposed for the CAP Strategic Plan and hence it is recommended that the Sub-Group will need to synchronise with those monitoring processes.

The measures set out in Table 5.1 relate specifically to the outcomes of the SEA and refer to the measures and indicators recommended to specifically monitor the accuracy of the predicted effects through the SEA. However, it is noted in some cases that the data required to monitor these effects does not currently exist. Additional measures are therefore proposed in Table 5.2 which are focused on making use of known existing datasets to monitor trends to which the Strategy does not solely contribute but to which it is expected to be an influencing factor. These additional measures are proposed with reference to the equivalent recommended measures in the EPA monitoring guidance and the recommendations on the broad monitoring parameters made by EPA during the SEA Environmental Report consultation exercise.

Table 5.1: Monitoring Measures and Indicators

Strategy Mission and Goals	Adverse or Uncertain Effects Identified by the SEA	Monitoring Measures and Indicators	Existing Data Sources, where Applicable
Mission 1: A Climate Smart, Environmentally Sustainable Agri- Food Sector			
Goal 1: Develop a climate neutral agri-food system	Scale up renewable energy (RE) sources, especially anaerobic digestion and biorefining, and solar PV and energy efficiency; possible unintended adverse impact on landscape, cultural heritage and biodiversity.	<p>Monitor the rate of new renewable applications over the strategy period and the numbers of these that are within or adjacent to designated landscapes and ecological sites or within 1 km of a designed heritage site.</p> <p>Annual estimate and reporting on carbon and GHG emission savings due to increased deployment of farm-scale renewables.</p> <p>Successful adoption of at least one carbon farming scheme under Action 4.</p> <p>Annual measurement and reporting of methane and other GHG emissions for the agricultural sector (all Actions).</p>	<p>Local authority planning reporting.</p> <p>DAFM, SEAI, DECC</p> <p>Strategy implementation reporting</p> <p>EPA</p>
Goal 2: Restore and enhance biodiversity	None	<p>Publication of national land use review study (as Action 3).</p> <p>Annual measurement and reporting of pesticide use, with focus on the Farm to Fork 50% reduction target by 2030 (Action 4).</p> <p>Monitor number of agricultural EIAs on which DAFM is consulted as prescribing authority (Action 7).</p> <p>Annual reporting on agri-environment scheme take-up through the new RDP (Action 2).</p> <p>Annual measurement and reporting of native broadleaf species composition in new woodland planting (Action 9).</p>	<p>Strategy implementation reporting</p> <p>Number of EIA consultation requests issued to DAFM</p>

Strategy Mission and Goals	Adverse or Uncertain Effects Identified by the SEA	Monitoring Measures and Indicators	Existing Data Sources, where Applicable
Goal 3: Protect high status sites and contribute to achieving good water quality and healthy aquatic ecosystems, as set out in the Water Framework Directive	None	<p>Monitor nitrogen fertiliser usage rates over the Strategy period to establish if rates fall (as Action 1).</p> <p>Monitor nitrogen and phosphorus levels of waterbodies, especially those already known to be effected by agriculture.</p> <p>Annual reporting around on farm chemical fertiliser use in relation to herd numbers.</p> <p>Annual reporting on agri-environment scheme take-up through the new RDP with specific reporting of uptake by more intensive farms where uptake has previously been lowest (Action 4).</p> <p>Publication of National Soils Strategy (as Action 5).</p>	<p>EPA</p> <p>Strategy Implementation Reporting</p>
Goal 4: Develop diverse, multi-functional forests	None	<p>Annual reporting on afforestation rates.</p> <p>Of above measure, reporting of the proportion of new planting that was for native broadleaved species.</p> <p>Measurement of number of individual farmers and land-owners participating in afforestation schemes and monitoring of how this changes over the Strategy period.</p>	DAFM
Goal 5: Enhance the environmental sustainability of the seafood sector.	None	<p>Measure the % of Marine Protected Areas and report on progress towards the target of 30% by 2030.</p> <p>Monitor uptake of Clean Oceans Initiative by the seafood sector and subject to availability</p>	DHLGH statistics

Strategy Mission and Goals	Adverse or Uncertain Effects Identified by the SEA	Monitoring Measures and Indicators	Existing Data Sources, where Applicable
		of suitable data seek to measure the quantity of plastics based litter removed each year.	BIM “Fishing for Litter” reporting and statistics
Goal 6: Embed the agri-food sector in the circular, regenerative bioeconomy	None	Publish preliminary data on food loss at primary production stage (Action 7) and develop indicators to monitor the trend in this aspect over the Strategy implementation period. Annual measurement and reporting on plastics packaging substitution rates for agri-food products (Action 8).	Strategy research Strategy research
Goal 7: Strengthen and invest in Origin Green and other sustainability supports to reflect higher level of ambition in agri-food sector	None	Monitor additional uptake of Origin Green over Strategy period (Action 4).	Bord Bia reporting and statistics
Mission 2: Viable and Resilient Primary Producers with Enhanced Well-Being			
Goal 1: Improve competitiveness and productivity of primary producers	Potential for increased productivity objective to result in increased output for livestock based sectors and associated potential for impact on air, water, biodiversity and climate. Potential for increased output in the tillage and horticultural sector to lead to increased fertiliser and pesticide use and permanent pasture conversion.	Monitor new applications and developments of pig and poultry units to establish if the Strategy is stimulating an increase in the sectors. Monitor and report on uptake of Origin Green and new agri-environment schemes in each of the sectors targeted by this goal (i.e., dairy, beef, sheep, pigs, poultry, horticulture and tillage). Annual reporting of permanent pasture conversion rates. Publication of National Soil Strategy during the Strategy period and that this reflects the	Bord Bia, DAFM DAFM Strategy Implementation reporting

Strategy Mission and Goals	Adverse or Uncertain Effects Identified by the SEA	Monitoring Measures and Indicators	Existing Data Sources, where Applicable
		broader sustainability objectives of the Strategy. Publication of Horticulture Strategy during the Strategy period and that this reflects the broader sustainability objectives of the Strategy.	Strategy Implementation reporting
Goal 2: Improve the creation and equitable distribution of value	None	Monitor and report on % of registered primary producers and fishery producers participating in quality assurance schemes (Action 4). Publication of proposal for grass-fed certification scheme during the Strategy period (Action 9).	Strategy Implementation reporting
Goal 3: Increase primary producer diversification and resilience	None	Annual monitoring and reporting percentage of utilisable agricultural area to be under organic production (Action 2).	Strategy Implementation reporting
Goal 4: Improve the social sustainability of primary producers	None	No environmental monitoring measures identified for this goal.	
Mission 3: Food that is Safe, Nutritious and Appealing, Trusted and Valued at Home and Abroad			
Goal 1: Prioritise coherent food and health policies to deliver improved health outcomes	None	No environmental monitoring measures identified for this goal.	
Goal 2: Enhance customer and consumer trust in our food system, providing evidence of a safe, ethical food supply	None	No environmental monitoring measures identified for this goal.	

Strategy Mission and Goals	Adverse or Uncertain Effects Identified by the SEA	Monitoring Measures and Indicators	Existing Data Sources, where Applicable
Goal 3: Increase value add in food & drink through insight, product development and differentiation	The SEA identifies the potential that a focus on R&D and focus on digital innovation and AI may disadvantage smaller producers who have less capacity to invest. The SEA also highlights the opportunity for improved environmental performance should the research related measures under this Goal incorporate a greater environmental and sustainability focus.	Annual monitoring and reporting on R&D activities funded and what proportion of these incorporate measures focused on the environment and / or SMEs. Monitoring and reporting on re-training initiatives for low skilled workers most at risk of being displaced by technological innovation and AI. Reporting of the proportion of these training initiatives that have an environment or sustainability focus.	DAFM, EPA, DETE
Goal 4: Develop market opportunities at home and abroad	The SEA identifies the potential for increased focus on exports to lead to an increase in food-miles and carbon footprint for some produce (Action 3)	Annual monitoring and reporting on export value of Irish sourced agri-food products. Uptake of farm-scale carbon offsetting schemes during the Strategy period, for example through woodland creation or peat restoration.	
Mission 4: An Innovative and Competitive Agri-Food Sector, Driven by Technology and Talent			
Goal 1: Move to a challenge focused innovation system	None	Monitor and report on climate based innovation measures supported by the Strategy (Action 2).	Strategy Implementation Reporting
Goal 2: A strategic funding approach to research, innovation and development	None, although it is identified as an enhancement opportunity that investment in research, innovation and development provides an opportunity for support for sustainability, climate and environment focused measures.	Monitor the proportion of funded research activities which have an environment or sustainability component and report on the outcomes of these projects.	
Goal 3: Develop a dynamic knowledge exchange environment	None	No environmental monitoring measures identified for this goal.	

Strategy Mission and Goals	Adverse or Uncertain Effects Identified by the SEA	Monitoring Measures and Indicators	Existing Data Sources, where Applicable
Goal 4: Enhance the use of technology and data	None		
Goal 5: Improve competitiveness and resilience	None	No environmental monitoring measures identified for this goal.	
Goal 6: Attract and nurture diverse and inclusive talent	None	No environmental monitoring measures identified for this goal.	
Goal 7: Policy coherence and synergies in Sustainable Food Systems (SFSs) between Ireland's domestic policy and its development cooperation and foreign policy	The SEA identifies uncertain effects on the population objective in terms of how Ireland's participation in international initiatives will influence domestic policy and consumption.	The identified uncertain or adverse effects only relate to the population SEA objective. No environmental monitoring measures are identified.	

Table 5.2: Additional Proposals

SEA Objective	Aspects Requiring Monitoring	Suggested Indicators	Existing Monitoring and Data
Biodiversity, Flora and Fauna	Conservation status of protected sites Ammonia deposition at protected sites	% of sites in favourable or improving condition Average site ammonia deposition rates in comparison with critical level.	NPWS and National Biodiversity Data Centre. Existing monitoring programmes are in place for reporting on status of specific species and habitats.: https://www.npws.ie/protected-sites

SEA Objective	Aspects Requiring Monitoring	Suggested Indicators	Existing Monitoring and Data
	Habitats Directive species Coastal habitats status	Number of designated sites exceeding the specific critical level. % of species in favourable conservation status over Strategy duration % of marine habitats in favourable status	
Population and Health	Incidences of stress, physical and mental illness in farming and fishing communities Notifiable accidents in farming and fisheries workers Farm retention rates amongst younger generations	% of workings in farming and fisheries scored 'below average' in self-administered mental well-being checks Death and injury rates per 100,000 workers Average age of workers identifying as working in agriculture or fisheries from census data.	Strategy reporting Health and Safety Authority data and annual reporting: https://www.hsa.ie/eng/Topics/Statistics/ National Census data: https://www.cso.ie/en/census/
Soil and Land-Use	Change in wetland and agricultural cover Peatland soils status	% landcover based on CORINE data Proportion of peatland soils subject to protection or management under agri-environment schemes.	CORINE data is updated every 6 years, most recently in 2018, with current data provided at: https://land.copernicus.eu/pan-european/corine-land-cover
Water	Surface water body ecological status Agricultural pollution levels in rivers	% in good or high status. % of locations exceeding the nitrate and phosphorous environmental quality standard. % of waterbodies failing WFD targets.	EPA annual reporting: https://www.epa.ie/environment-and-you/freshwater-and-marine/

SEA Objective	Aspects Requiring Monitoring	Suggested Indicators	Existing Monitoring and Data
Air	Atmospheric concentrations of key agricultural pollutants	Annual average background concentrations of NO _x , NMVOC, particulates and ammonia at locations recording these parameters.	Real-time air quality monitoring data provided by EPA at: https://www.epa.ie/our-services/monitoring--assessment/air/
Climate	Agricultural contribution to GHG	Annual recorded sectoral emission statistics	National reporting provided on EPA website: https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/

6 REFERENCES

EPA (2020) SEA Pack.

EPA (2015) Developing and Assessing Alternatives in Strategic Environmental Assessment.

Gonzalez, Therival, Gaughran and Bullock (2020) Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring.

Government of Ireland (2004) Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment Guidelines for Regional Authorities and Planning Authorities.

APPENDIX A: SCOPING CONSULTATION RESPONSES

Table A1: Statutory Consultee Comments

Com Ref.	Page of Letter	Scoping Report Ref.	Comment	Actions Carried out to Address Comment
Organisation: Department of Housing, Planning and Local Government - Marine Environment, Water Division				
Date received: 25 August 2020				
1	1	2.7 & Appendix A	<p>Section 2.7 on page 12 refers to the plans and programmes and conservation objectives that have been considered and these are listed in Appendix A. The list on page 12 of Appendix A does not include Ireland's Marine Strategy under Article 5 of the Marine Strategy Framework Directive (2008/56/EC) as updated during the second cycle of the directive. Part 1 of this update was published in June 2020 and contains a new assessment of the status of the marine environment, a revised determination of good environmental status and revised environmental targets and, where relevant, threshold values for marine and transitional waters (Ireland's EEZ and the soil and subsoil of the extended continental shelf). Some of these environmental targets relate specifically to commercial fish and shellfish and to contaminants in seafood, while others relate to biodiversity, marine litter and seafloor integrity. See the links here:</p> <p>https://www.housing.gov.ie/sites/default/files/publications/files/2020_june_article_17_update_to_irelands_marine_strategy_part_1_articles_8_9_10_final.pdf</p> <p>https://www.housing.gov.ie/sites/default/files/publications/files/appendices_-_assessment_sheets_.pdf</p>	Addressed in Section 4.2 and Appendix B of the Environmental Report.
2	1	Appendix A	<p>Similarly, the June 2020 Programme for Government makes a commitment to achieving specific levels of marine protection (page 83 of the programme and reproduced below). This consultation process has now commenced and this commitment should be included with the other points listed on pages 17 and 18 of Appendix A. This commitment is also cross cutting through the commitments under the national biodiversity action plan, UN SDG14, the OSPAR strategy for the northeast Atlantic and the UN Convention on biological diversity.</p>	Addressed in Appendix B of the Environmental Report.

Com Ref.	Page of Letter	Scoping Report Ref.	Comment	Actions Carried out to Address Comment
			<p>Marine Protection Areas</p> <p>We support the principles and ambition of the EU Biodiversity Strategy and will develop comprehensive legislation for the identification, designation and management of Marine Protected Areas (MPAs) in Irish territorial waters. We will realise our outstanding target of 10% under the Marine Strategy Framework Directive as soon as is practical and aim for 30% of marine protected areas by 2030. This will be done on the basis of scientific expertise and in close consultation with all stakeholders, in particular the fishing industry as well as environmental and community representatives. This consultation process will begin in the first 100 days of Government. We will examine the establishment of an offshore maritime area as Ireland's seventh national park. This would form part of the expanded MPA's and allow for a learning experience in the maritime environment.</p>	
3	1	Table 4.1	<p>Finally, Section 4.1, Table 4.1 (SEA Objective) row 5 (Water – protect, enhance and manage water resources and flood risk) point c should be amended to reflect the requirements of the Marine Strategy Framework Directive – and mirror point b for freshwater.</p> <p>Proposed new wording for point c: Support the Marine Strategy Framework Directive achievement of good environmental status by protecting and improving Protect and improve the quality of marine waters, particularly those involved in seafood growing and fishing.</p>	Point 5c updated in Table 3.2 of the Environmental Report
Organisation: Department of Environment, Climate and Communications - Geological Survey Ireland				
Date received: 1 September 2020				
4	1		With reference to your email dated 28 August 2020, regarding the AGRI-FOOD STRATEGY 2030, Strategic Environmental Assessment Scoping Report, please note that Geological Survey Ireland has no further comment or observations to make on this matter since our previous response (copied below).	Noted.
5	1		<p>Groundwater</p> <p>Groundwater is important as a source of drinking water, and it supports river flows, lake levels and ecosystems. It contains natural substances dissolved from the soils and rocks that it flows through, and can also be contaminated by human actions on the land surface. As a clean, but vulnerable, resource, groundwater needs to be understood, managed and protected.</p>	Included within Section 3.6 of the Scoping Report

Com Ref.	Page of Letter	Scoping Report Ref.	Comment	Actions Carried out to Address Comment
6	1		Through our Groundwater Programme, Geological Survey Ireland provides advice and maps to members of the public, consultancies and public bodies about groundwater quality, quantity and distribution. Geological Survey Ireland monitors groundwater nationwide by characterising aquifers, investigating karst landscapes and landforms and by helping to protect public and group scheme water supplies. We recommend the use of GSI's National Aquifer, Vulnerability and Recharge maps. Further information is available on our Map viewer.	Data viewer used in the review of baseline information in Section 4.3 of the Environmental Report.
7	1		With regard to Flood Risk Management, there is a need to identify areas for integrated mitigation and management. Our GWFlood project is a groundwater flood monitoring and mapping programme aimed at addressing the knowledge gaps surrounding groundwater flooding in Ireland. The project is providing the data and analysis tools required by local and national authorities to make scientifically-informed decisions regarding groundwater flooding. We recommend using the GSI's GWFlood tools found under our programme activities to this end.	Noted
8	2		With regards to Climate Change, there is a need to improve the monitoring capacity of groundwater levels in Ireland so that the potential impacts of climate change can be monitored and assessed. In this context the GSI has established the GWClimate project in January 2020. GWClimate will 1) establish a long-term strategic groundwater level monitoring network and 2) develop modelling and analytical approaches for evaluating the impacts of Climate Change to Irish groundwater systems. Further information can be found on the Groundwater flooding page of the Groundwater Programme.	Included within Section 3.6 of the Scoping Report
Organisation: Department of Environment, Climate and Communications - Inland Fisheries Ireland				
Date received: 25 September 2020				
9	2		Aquatic Biological Diversity Pollan for example are a rare endangered and protected species listed and protected under Annex 5 of the Habitats Directive. The Irish Pollan (<i>Coregonus Pollan</i>) 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 (<i>Salvelinus alpinus</i> – 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	Addressed in Section 4.3 of the Environmental Report.

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			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.	
10	2		The National Fisheries Resource – sustainable exploitation and the economy 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.	Addressed in Section 4.3 of the Environmental Report.
11	3	3.6	The EU Water Framework Directive 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.	Addressed in Section 4.3 of the Environmental Report.
12	3-4		Agri-food Strategy to 2030 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	Addressed in Table 3.2 of the Environmental Report.

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			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 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.	
13	4		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).	Noted.
14	4		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	Taken into consideration in Section 6 of the Environmental Report

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			introductions and consideration of these issues should be taken in the next stage of the current SEA process.	
15	4	5.2	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.	Reasonable alternatives reviewed and reworded. See Section 5 of the Environmental Report
16	4-5	Table 2.2 and 4.1	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 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): <ul style="list-style-type: none"> • 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 	Taken into consideration in Table 3.2 of the Environmental Report
17	5		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	Noted

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			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.	
Organisation: Department of Environment, Climate and Communications - Waste Policy & Resource Efficiency Division				
Date received: 25 September 2020				
18	1	3.9	There is a reference in it to previous Resource Efficiency Action Plan and a mention of the public consultation for our current plan. (Chapter 3.9). This should be updated with reference to the newly publish Waste Action Plan for a Circular Economy.	Addressed in Section 4.2 and Appendix B of the Environmental Report.
19	1	2.7 & Appendix A	There is a reference to 2 Departmental Resource Efficiency Action Plans (DAFM and DEBI) in Chapter 2.7. These Action Plans are non-statutory, administrative actions only. Suggest deleting references to both DAFM and DBEI Resource Efficiency Action Plans.	Departmental Resource Efficiency Action Plans removed.
20	1	3.9	The document is dated in its detail on Ireland's achievement of EU targets, in respect of ELVs, WEEE and batteries. (Chapter 3.9). The link to the EPA national waste statistics website. http://www.epa.ie/nationalwastestatistics/targets/ shows Ireland has achieved those targets.	Updated in Section 4.3 of the Environmental Report
Organisation: Environmental Protection Agency				
Date received: 25 September 2020				
21	1		Overall the EPA welcomes the information and level of detail in the Scoping Report and the associated Appendices. The suggestions in the following sections and Appendices are seeking to inform and assist the ongoing SEA process and the preparation of the Strategy and SEA Environmental Report. We also recommend integrating the findings of the environmental assessments (SEA and Appropriate Assessment (AA)) into the Strategy.	Noted

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22	1-2		Additionally, the EPA's submission to the Agri-Food Stakeholder Committee 'Strategic priorities to 2030 for A Climate Smart, Environmentally Sustainable Agri-Food Sector' is included as Appendix 3, to consider in preparing the Strategy and the SEA). The submission sets out the EPA's overall recommendations to establish an environmentally sustainable agri-food sector, while also recognising the need to achieve a balance between economic, social and environmental considerations. This should be treated as part of this scoping submission and the issues raised should be addressed as part of the Strategy making and SEA processes.	Submission has been reviewed as part of both Strategy and SEA
23	2		<p>Some of the key aspects raised in the submission to the Agri-Food Stakeholder Committee include:</p> <ul style="list-style-type: none"> • Promote the use of protected urea over less environmentally sustainable fertilisers and opt for nutrient management activities that have multiple environmental benefits, supported by relevant training and awareness through ASSAP1. • Support the need to focus on breaking the link between animal numbers, fertiliser use and deteriorating water quality. This will also see reductions in greenhouse gases and ammonia emissions. • In catchments with known nitrogen pollution, measures need to be implemented immediately to halt and reverse the continuing nitrogen emissions to water. • The Strategy should look to prevent the continued loss of diffuse phosphorus in catchments under pressure, and support measures to protect and use riparian zones/ buffer strips as barriers to protect our water bodies from pollutants. This approach will also serve to protect biodiversity, reduce sediment and pathogens such as VTEC, in our water courses. • The promotion of more widespread high-nature value farming initiatives, particularly in high status waterbody areas. • Provide more clarity in terms of how the Strategy will address the EU Farm to Fork Strategy and its targets to transform the EU's food system. • Support and promote agri-environmental schemes based more on payments for results and ecosystem service activities rather than the current 'payments for costs incurred or income foregone' approach. 	Reviewed as part of 2030 Strategy Committee Stakeholder contribution
24	2-3		<p>Sustainable Development Goals & Key Actions for Ireland</p> <p>Our most recent State of Environment Report Ireland's Environment- An Assessment 2016</p>	The Environmental Report has taken into

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			(EPA, 2016) identified seven Key Actions for Ireland which align with many of the UN Sustainable Development Goals (SDGs). The relevant aspects of these Key Actions and the SDGs should be taken into account in preparing the Strategy and SEA and should be reflected in the principles/objectives/measures in the Strategy. This will ensure that the Strategy aligns with and contributes to achieving Ireland's sustainable development and environmental protection ambitions.	consideration the key messages from the 2020 report, which also account for the 2016 key actions.
25	3	3	Ireland's Environment 2020 is due to be published in Quarter 4 2020. Once published, the relevant chapters and aspects of the 2020 report should be taken into account in finalising the Strategy. In particular reference should be made to the chapter on agriculture and key relevant related chapters (for example: water, climate, biodiversity, industry).	Addressed in Section 4.3 of the Environmental Report.
26	3	2.7 & Appendix A	The relevant objectives and policy commitments of the National Planning Framework should also be aligned with and considered, as appropriate.	Addressed in Appendix B of the Environmental Report.
27	3		Transition to a low carbon climate resilient economy and society You should ensure that the Strategy aligns with relevant national commitments on climate change mitigation and adaptation, as well as any relevant sectoral, regional and local adaptation plans.	Addressed in Appendix B of the Environmental Report.
28	3		Scope of the SEA The Strategy should clearly set out the scope, remit and implementation related elements of the Strategy. These will have implications for the SEA, in terms of guiding the level of assessment applicable at the appropriate level for the Strategy. Where it is envisaged that measures proposed in the Strategy will be implemented via other plans, which themselves have been or will be subject to SEA, this should be explained in the Environmental Report and taken into account in the assessment. Where specific measures will be implemented directly through the Strategy, further detail should be provided in the Environmental Report and Strategy on the relevant environmental assessments to be carried out at the project stage and relevant mitigation measures to be applied, as appropriate. There may be merit in exploring this issue further with the relevant Environmental Authorities during the Strategy preparation and SEA processes.	Agreed, reflected in SEA ER

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29	3-4		Integration of SEA and Strategy All recommendations from the SEA and AA processes, including mitigation measures, should be integrated in the Strategy. We recommend that the Strategy includes summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to the proposed mitigation measures, monitoring programme and Strategy policies/measures.	Strategy will reference the SEA process
30			Monitoring, Review & Reporting We recommend including a commitment in the Strategy to prepare a parallel Implementation Strategy/Programme to facilitate monitoring the implementation of the Strategy, including its ongoing environmental performance. Establishing an Environmental Working Sub Group would also provide for oversight of the Strategy related environmental monitoring and reporting. The arrangements in place for the implementation stages of plans such as Food Wise 2025, Grid 25, Offshore Renewable Energy Development Plan and the Wild Atlantic Way Operational Programme would be worth considering, as appropriate. The Strategy should include a commitment to implement the environmental monitoring programme and associated reporting. We suggest including a separate section on 'Environmental Monitoring, Review and Reporting' in the Strategy, setting out the provisions for monitoring and reporting, including parameters, frequency and responsibilities, on the implementation of the Strategy and periodic reviews. Where possible, aligning the periodic reviews of the Strategy to coincide with existing cyclical reporting would be useful to consider e.g. Ireland's Environment, National Planning Framework, Water Framework Directive, Marine Strategy Framework Directive etc. In between review periods for the Strategy, we recommend that Strategy related implementation reports are published annually, or biennially, as appropriate. We recommend aligning these with the environmental monitoring required under the SEA legislation. This will enable the environmental performance of the Strategy to be evaluated, allow significant negative trends to be determined and acted upon. It will also provide for increased transparency during implementation.	Implementation chapter will be included in the Strategy

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31	4		The SEA-related monitoring should address positive, negative and cumulative effects where they are likely to occur and should include provision for on-going review to facilitate an early response to any significant environmental issues including trends that may arise. The Environmental Report should specify the monitoring frequency and responsibilities and include provisions for reporting on the monitoring. To avoid duplication in data collection, the same indicators should, where possible, be used for the Strategy-related environmental monitoring and SEA-related monitoring.	To be taken into account in preparation of monitoring framework.
32	4	2.7	Integration with other key Plans and Programmes We recommend including relevant schematics in the Strategy and SEA Environmental Report, showing the links and key inter-relationships with other relevant national, regional, sectoral and environmental plans, programmes or strategies.	Noted. Links to other Plans, Programmes and Strategies are included.
33	5		Available Guidance & Resources Our website contains various SEA resources and guidance, including: <ul style="list-style-type: none"> • SEA process guidance and checklists • Inventory of spatial datasets relevant to SEA • Topic specific SEA guidance (including Good practice note on Cumulative Effects Assessment (EPA, 2020), Guidance on SEA Statements and Monitoring (EPA, 2020), Integrating climatic factors into SEA (EPA, 2019), Developing and Assessing Alternatives in SEA (EPA, 2015), and Integrated Biodiversity Impact Assessment (EPA, 2012)). Environmental Sensitivity Mapping (ESM) Webtool EPA SEA WebGIS Tool EPA WFD Application EPA AA GeoTool State of the Environment Report – Ireland’s Environment 2016	EPA guidance and information sources have been used in the SEA process.
34	5		Environmental Authorities Under the SEA Regulations, you should also consult with: <ul style="list-style-type: none"> • The Minister for Housing, Planning and Local Government; • The Minister for Agriculture, Food and the Marine, and the Minister for Communications, Climate Action and Environment • The Minister for Culture, Heritage and the Gaeltacht 	The Scoping Report has been issued to these Environmental Authorities, and they will be consulted on the Environmental Report.

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35	7	2.6	Scope of the SEA We note in section 2.6 - Spatial and Temporal Scope that a longer-term view will be taken on potential impacts rather than seeking a set fixed temporal scope. We recommend that the Strategy is supported by environmental monitoring and reporting at regular intervals over its lifetime. The Strategy and SEA should seek to align with other relevant long-term plans / programmes / strategies at national, EU and international level in the context of ensuring the appropriate alignment and integration of relevant environmental commitments and targets over the lifetime of the Strategy.	To be considered in the Environmental Report during drafting of monitoring proposals.
36	7	Table 2.2	We note the sustainability topics covered in Table 2.2, we recommend adding an additional row for the inter-relationships between each of those sustainability topics.	Natural capital is intended as a means for assessing the inter-relationship of topics and is combined with this overarching topic. Addressed in Table 3.2 of the Environmental Report.
37	7	2.7	Relationship to other plans and programmes Farm to Fork While the Scoping report refers to the Farm to Fork Strategy in relation to some key influential plans and programmes, the SEA and the Strategy should consider setting out the specific reduction targets to be achieved under this Farm to Fork Strategy, with regard to fertilisers, pesticides, antimicrobials used on farm animals and ambition to achieve 25% of agricultural lands under organic farming by 2030. The EU Farm to Fork and EU Biodiversity strategies should receive greater focus in the SEA Environmental Report and the Strategy. The influence of the CAP reform and increased focus on environmental credentials under these EU strategies should also be reflected in the SEA and Strategy.	While the Farm to Fork Strategy (F2F) sets out a number of targets these are not legally binding and will be the subject of legislative changes to be preceded by Impact Assessments. So agree that F2F and Biodiversity Strategies set a framework/vision which needs to be taken into account, however, specific targets for individual

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				countries are not clear at this stage.
38	7	3	Baseline We note that LULUCF is recognised as a key component in helping monitor the national strategic long-term vision for prosperous, modern, competitive and climate neutral economy by 2050. It is important to also recognise in the Strategy the role LULUCF can play in monitoring land use change. Monitoring land use/ land use change will help us understand how well land use activities are progressing when it comes to supporting the national efforts of addressing climate change and the decline in nature.	The strategy refers to the need to develop a land use strategy
39	7	3.2 and Table 2.2	Biodiversity / Natural Capital We suggest a subsection is included which incorporates Biodiversity and Flora and Fauna (as set out in the SEA Directive). Natural Capital could be addressed as a sub-section under biodiversity.	Sustainability topic has been renamed Biodiversity and Flora and Fauna. Natural capital is intended as a means for assessing the inter-relationship of topics and is combined with this overarching topic.
40	7	3.3	We also note that Chapter 3 includes a subsection on socio-economics. In the SEA Directive, these are addressed under the criteria 'Population and Human health'. We suggest that the population and human health aspects are retained in the SEA, while the economic related aspects be moved into the Strategy for consideration there, rather than in the environmental assessment itself.	Sustainability topics have been amended to Population and Human Health.
41	7		In relation to Green Corridors, the SEA could promote the need to protect, and where possible enhance, existing important ecological corridors on farmland.	Addressed in Table 3.2 of the Environmental Report.
42	8	3.2 and 3.7	With regards the impact of nitrogen on ecosystems, a recent EPA Research Report 'Critical Loads and Soil-Vegetation Modelling (Aherne et al., 2020) highlights several relevant concerns in relation to the impact of agricultural nitrogen emissions on ecosystems: <ul style="list-style-type: none"> • Based on current scenarios, exceedances of critical loads of eutrophication is not predicted to change by 2030, owing to national increases in reduced nitrogen deposition. • Biodiversity-related critical loads for nitrogen indicates that Irish habitats are more sensitive 	Addressed in Section 4.3 of the Environmental Report.

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			<p>to nitrogen deposition than the recommended empirical critical load ranges for European habitats. This means that current estimates of the extent of nitrogen impacted habitats are likely to be underestimated.</p> <p>The scope of the SEA should specifically consider and address the risks posed to Irish habitats and ecosystems as a result of agricultural emissions to atmosphere, and how sustainable practices can contribute to preserving these ecosystems. In addition, consideration should also be given to supporting and contributing to mechanisms for the ongoing monitoring and evaluation of agricultural emissions on natural ecosystems.</p>	
43	8	3.2	<p>Marine</p> <p>While we acknowledge that the Scoping Report includes references to marine protected areas, we recommend also referring to the need to increase the extent of Marine Protected Areas, to meet the current international requirements of conservation of 10% of marine and coastal areas, with a greater target of 30% of all coastal/marine areas by 2030, under the EU Biodiversity Strategy.</p> <p>We note that the Scoping Report acknowledges that the seafood industry has a big impact on fish stocks and the marine environment. As mentioned in our previous submission, with regard to commercial exploitation of natural marine kelp / microalgae forests, a precautionary approach needs to be taken, given the role these ecosystems play in terms of climate mitigation and adaptation and supporting marine biodiversity.</p>	Addressed in Section 4.3 of the Environmental Report.
44	8	3.6	<p>Water Quality</p> <p>The Scoping Report clearly recognises the challenges facing the Agri-Food sector with regards protecting water quality from further decline. In preparing the SEA Environmental Report (ER), it will be important that the appropriate water quality mitigation measures are established, implemented and monitored to ensure water quality status is improved and the Strategy is implemented in an environmentally sustainable manner. These will need aligning with WFD obligations. The SEA should look to promote mitigation measures with multiple environmental co-benefits, where possible.</p>	The need to address existing challenges for water quality has been fed back to the strategy team and reflected in the actions proposed. Additional mitigation is proposed in the mitigation section of the SEA Environmental Report.

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45	8	3.5	<p>Section 3.5 Soil and Land Use</p> <p>This section should be updated to reflect the latest available information from Teagasc, with regards current soil pH/fertility issues currently occurring in Ireland. These are well documented by Teagasc. See for example: https://www.teagasc.ie/crops/soil--soil-fertility/soil-ph--liming/)</p> <p>With reference to land, the scoping report should refer to the 26.8 Mt CO₂eq credits available to Ireland under the LULUCF Regulation (2018/841 (EU)).</p>	Addressed in Section 4.3 of the Environmental Report.
46	8-9	3.7	<p>In Table 3.4: Emissions from the Agriculture sector, the percentage value for NO_x should be updated to 33.4% for 2018. Additionally, the supporting text should also consider the adjusted emission values which are used for compliance purposes. The following link provides more information on this.</p> <p>http://epa.ie/pubs/reports/air/airemissions/irelandsairpollutantemissions2018/</p>	Addressed in Section 4.3 of the Environmental Report.
47	8-9	3.7	<p>The text below Figure 3.4: Contribution to Ammonia Emissions in 2018 (EPA, 2020), should be updated to reflect the following report :</p> <p>http://epa.ie/pubs/reports/air/airemissions/irelandsairpollutantemissions2018/ and our data and Inventory Report submission which can be found at: https://www.ceip.at/status-ofreporting-and-review-results/2020-submissions</p>	Addressed in Section 4.3 of the Environmental Report.
48	8-9	3.7	<p>On page 35, the subsection on policy response should also refer to the DAFM Draft National Climate and Air Roadmap for the Agriculture Sector to 2030 ("Ag-Climatise").</p>	Addressed in Section 4.3 of the Environmental Report.
49	9	3.6	<p>In Section 3.6 Water, consider referring to the actual requirements of the WFD in terms of its key aims. The SEA (and Strategy) should refer specifically to the relevant objectives of the National River Basin Management Plan for Ireland. The baseline water quality information should take account of the most recent available water quality information and reports from the EPA. While the Strategy acknowledges the need for good status of quality under the Water Framework Directive (WFD), it should also highlight the equally important objectives for no deterioration, protection of high-status waters or protected areas objectives of the WFD also.</p>	Addressed in Table 3.2 and Section 4.3 of the Environmental Report and Appendix B.
50	9	3.6	<p>While the link with the Habitats Directive is addressed, the SEA should also consider to a greater extent the interlinkages on policy between biodiversity and the water quality under the WFD.</p> <p>The SEA should include a reference to the Marine Strategy Framework Directive and the EU</p>	Noted in the SEA preparation and comment passed to Strategy team to

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			Biodiversity Strategy. Additionally, the SEA (and Strategy) should refer to the forthcoming CAP Reform and include a commitment to amend the Strategy, once the CAP Reform has completed to ensure that the Strategy aligns with our relevant European level commitments. This is particularly important, given that the CAP will probably be the most critical aspect underpinning the socio-economic and environmental considerations for the Strategy.	address in the Strategy as they see fit.
51	9	3.2	Page 17: Reference should be made to the new CAP, as a key Strategy that will influence the Strategy.	Addressed in Section 4.2 of the Environmental Report and Appendix B.
52	9	3.6	Page 28: We note the reference to Groundwater abstractions as being a negligible component of primary abstraction, groundwaters account for about 20% of Public Water Supplies and should be recognised in this context.	Noted.
53	9	3.6	Page 28: We suggest including a reference to the River Basin Management Plan	Information from the River Basin Management Plan has been used.
54	9	3.6	Page 28: we note the reference to a Teagasc document that indicates the EPA decided on the priority catchments that the ASSAP teams are working in (this is incorrect, the EPA facilitated the process, while decisions were actually made by public authority stakeholders, including elected representatives)	Corrected in Section 4.3 of the Environmental Report.
55	9	3.6	Page 28: includes a reference to an EPA pers comm reference to agricultural intensification has caused localised water quality issues. The term 'localised' underplays the problems, and their widespread impact in places should be also referred to.	Corrected in Section 4.3 of the Environmental Report.
56	9	3.6	Page 31: refers to a Dept/EPA report from 1999 indicating that groundwater is mainly impacted by point source agricultural sources. The context is misplaced because significant groundwater impact e.g. to a water supply is going to come from the point sources (petrol tanks, silage leaks etc.), but diffuse pressures from land spreading or grazing animals are having an impact on surface water via diffuse groundwater pathways (and to a small number of Water Supplies).	Corrected in Section 4.3 of the Environmental Report.
57	10	3.6	Page 30: Ammonium arising from drainage of organic soils for agriculture and/or forestry is also an issue of concern.	Addressed in Section 4.3 of the Environmental Report.

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58	10	3.6	Page 31: The indication that Ireland's marine waters are not showing signs of nutrient pollution is not correct. Marine waters include nearshore coastal waters and estuaries, many of which are showing signs of eutrophication. Reference could be made to the Water Quality issues mentioned in the MSFD Article 17 report. (https://www.housing.gov.ie/water/water-quality/marine-strategy/marinestrategy-framework-directive-200856ec-article-17-update)	Addressed in Section 4.3 of the Environmental Report.
59	10	3.6	Page 32: while a number of policy response areas are included, more may arise once the overall analysis begins, and any significant ones should be included.	Noted.
60	10	3.6 and 6.5	Page 32 and Page 54: Despite measures being 'successfully implemented' under a range of policy responses, there are continuing declines in all the environmental indicators. In light of this, the robustness of implementation or suitability of the existing measures should be assessed. It will be an important consideration for the Strategy that there are robust and practical indicators developed early on, that directly link the measures to environmental outcomes, so that the Strategy can be quickly adapted if or when it is seen to be having a negative impact on the environment.	Considered by the Strategy development team
61	10	3.13	Page 45: Should also include the following as a threat to water: physical modifications to, and drainage of, water bodies such as rivers and lakes	Addressed in Section 4.4 of the Environmental Report
62	10	3.13	Page 45: While reference is made to ammonium and phosphate being the nutrients of concern for water, should it refer instead to nitrates and phosphate.	Addressed in Section 4.4 of the Environmental Report
63	10	3.6	With regards to flooding, the SEA should recognise and support options for natural flood risk management, which would provide additional environmental co-benefits, in terms of support for biodiversity for example. The benefits of maintaining wetlands or poorly drained areas, in terms of their biodiversity value and climate mitigation potential should be recognised and supported.	Noted
64	10	3.6	Forestry The SEA should recognise that in relation to high status waters, sediment loss in upland catchments is the most important pressure impacting high status waters. The SEA should consider including a mitigation measure recommending a greater level of Forest Service oversight when/where forestry related operations are planned in high status catchments.	Addressed in Section 4.3 of the Environmental Report. To be considered in the mitigation measures

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			Immediate remediation actions are also needed where forestry is currently causing water quality problems.	
65	10	3.7 and 3.8	<p>Air Quality / Climate Change</p> <p>We acknowledge that the Scoping report clearly identifies the impact of the Agri-Food sector on climate change and air quality, with regards the levels of greenhouse gases and ammonia emissions. Reducing sectoral greenhouse gas and ammonia emissions will be a critical component for success of the Strategy.</p> <p>Air quality and air pollutant parameters should be clearly defined. For example, emissions of the air pollutant ammonia into the atmosphere is not per se an air quality issue, but its contribution as a source of secondary particulate matter (PM) in the air we breathe is an issue.</p>	Addressed in Sections 4.3 and 4.4 of the Environmental Report
66	11		<p>Environmental Sustainability</p> <p>Clear commitments are required regarding sustainable farming and land management practices, including promotion of organic farming practices, such as the use of protected urea etc.</p>	Considered as part of Strategy Development
67	11		In our previous submission (Appendix 3), we highlighted the need for outcome-focussed metrics and activity-based metrics, both of which should be linked, to allow for accountability in land use and land management practices.	Considered as part of Strategy Development
68	11		We also highlighted the need to consider sustainability related food labelling for national produce, showing carbon intensification/sustainability information. These aspects should be considered and promoted.	Considered as part of Strategy Development
69	11		Emissions of ammonia from the intensive pig and poultry sector, currently stand at about 11% nationally. This is significantly lower than from cattle and for the most part, these are addressed within current IED licensing controls. It is worth noting however that there are large numbers of pigs and poultry activities operating below the IED threshold under LA planning. Despite only contributing to 11% of national ammonia emissions, in the border region (County Cavan and County Monaghan) spatially, they are quite concentrated, with over 115 EPA licensed installations and an additional 24 new applications on hand in the pig and poultry sector, at an approx. ratio of 80:20 (Monaghan/Cavan). The cumulative impacts of ammonia from these and other installations/operations on nearby Natura 2000 sites needs to be better understood and considered, in preparing the Strategy. This is particularly important in the	Ammonia issues considered as part of the Strategy and Agri Climate and Air roadmap development

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			context of ensuring environmental sustainability. Ammonia has especially detrimental effects on species and habitats that are sensitive to elevated levels of nitrogen input. The concentration of intensive agriculture sites, in-combination with other farming activities (e.g. dairy and beef), have the potential to impact on the critical level and critical loads for sensitive species at Natura sites in this region also.	
70	11		We recommend that the SEA (and Strategy) include a reference to the relevant Best Available Techniques (BAT) Conclusions which are statutory requirement for existing Industrial Emission licenced activities from February 2021. The BAT Conclusions cover emissions such as ammonia, odour, noise, and the storage and management of organic fertiliser. They are applicable for new licensable activities, since their introduction in February 2017. Existing licensed activities have until February 2021, to implement all requirements. Information on these BAT conclusions is available at https://eur-lex.europa.eu/legalcontent/EN/TXT/PDF/?uri=CELEX:32017D0302&from=EN .	Considered within Section 6 of the Environmental Report
71	11		We refer you the EPA report Ireland's Transboundary Gas Emissions – 1990-2030 (EPA, 2019) to take into account with regards transboundary emissions considerations.	This report has been used in compiling Section 4.3 of the Environmental Report.
72	11		Consider developing and encouraging: <ul style="list-style-type: none"> • economically sustainable farm systems and practices for less intensive farms that focus on producing quality food for a premium price. • promoting 'high nature value' farming and the wealth of environmental benefits to gained from these initiatives • developing and supporting agri-environmental schemes that provide payments for results-based, ecosystem services. 	Considered as part of Strategy Development
73	12		The current model of 'payments for costs incurred or income foregone' promotes a concept that farming with the environment is a burden or results in negative outcomes for the farmer which is not accurate or effective. A review of the existing national taxation and subsidy system is needed, to identify agri-food related relief schemes that are environmentally harmful and that are unsustainable and replace them with schemes that reward environmental sustainability.	Outside the remit of the Strategy

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74	12	3.9	Waste In Section 3.9 – Material Assets, on page 38, on recycling targets, the SEA should reflect the most recent EPA publication on this http://epa.ie/newsandevents/news/name,69297,en.html	Addressed in Section 4.3 of the Environmental Report.
75	12	3.9	We acknowledge that the Scoping report includes references to the Food Waste Charter under the National Waste Prevention Programme and Smart Farming initiative. This section would benefit from also recognising the benefits of supporting the development of an all-of-value-chain National Food Waste Reduction Roadmap. This should include clear national and sectoral targets for 2025 and 2030, in order to meet the relevant national food waste prevention targets.	Noted
76	12	3.9	With reference to Food Waste, that may arise in implementing the Strategy, the SEA and Strategy should also look to support the following: <ul style="list-style-type: none"> • The development & implementation of a National Food Waste Roadmap, building on the national stopfoodwaste.ie householder campaign and the business-focused Food Waste Charter. • Implement a systematic programme to identify and reduce on-farm losses of food produced for human consumption, for reporting in national statistics. • Strengthen the 'Origin Green' brand through the inclusion of food waste prevention action plans with robust reporting of carbon saving for processing, distribution and retail businesses. • Promote public behaviours to prevent household food waste through high-profile DAFM agencies & activities - such as Bord Bia and the "Food Dudes Programme". 	Food waste is being considered in the Strategy
77	12	3.9	The Scoping report includes references to "new and more efficient use of wastes, e.g. food waste". The Strategy and SEA should acknowledge that food waste must be managed in accordance with the food waste hierarchy (see the figure below). Where prevention of food waste is prioritised, the emphasis can then focus on 'new and more efficient uses of wastes'.	Strategy is taking a food system approach
78	12	3.9	With regard to hazardous wastes that may arise in implementing the Strategy, the SEA and Strategy should consider: Introducing measures to address the large amounts of hazardous waste generated through agricultural production. Producer Responsibility initiatives including take-back of surplus product; along with training on best practice to maximise efficiency in using farm chemicals are potentially strong prevention measures.	Considered as part of Strategy Development

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79	12	3.9	Supporting the establishment of a national collection scheme for unavoidable farm hazardous waste, should be pursued as a matter of urgency. The EPA pilot scheme which operated from 2013-2017 demonstrated the feasibility and demand for such a service. The pilot scheme identified the typical chemicals requiring disposal and estimated quantities stockpiled on farms and which are being generated annually.	Considered by the Strategy development team
80	13	3.9	The SEA should specifically consider the risks posed to the environment and food with respect to hazardous waste management. The EPA farm hazardous waste collection pilot scheme collected nearly 1,000 tonnes of hazardous waste from farmers around the country. Of this waste, 68 tonnes were waste pesticides (some banned for use for decades) and 53 tonnes were waste veterinary products. The SEA should therefore consider risks related to storage of chemicals on farms, the need to properly manage prohibited substances and the development of a long-term mechanism to support the safe management and collection of farm hazardous waste to ensure that it does not enter the environment.	Noted but not within the direct remit of the Strategy
81	13	3.9	The SEA should highlight the need for sustainable use of pesticides and their management as well as in the Strategy. The next review of the National Action Plan for the Sustainable Use of Pesticides should include specific and measurable reductions in the use of pesticides of concern along with timeframes for the achievement of those reductions. This is in order to attain the reduction of 50% usage of hazardous pesticides by 2030 in accordance with the EU Farm to Fork initiative. The Strategy should, in particular, take this into account.	Comment passed to Strategy development team for consideration
82	13	3.9	Further research into development of biopesticides should be encouraged in the Strategy and the SEA.	Considered by the Strategy development team
83	13	3.9	There is a need to increase enforcement of biocides regulations for waste pesticides storage. This is necessary to ensure that pesticides which can no longer be used are removed from circulation in an environmentally safe manner. This aspect should be reflected in the Strategy and the SEA.	Considered by the Strategy development team
84	13		Smarter Farming Practices We recommend that the SEA and Strategy recognise, support and promote the need for greater uptake of sustainable farming practices across all agricultural sectors. This can be achieved through the establishment of case studies, networks, knowledge exchange, supports & tools. The farmer led Smart Farming initiative is an exemplar programme in this area, which	Considered by the Strategy development team

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			has demonstrated reduced environmental impacts while delivering savings and efficiencies to participating farmers. This Smart Farming and other similar models should be reflected in the Strategy and SEA.	
85	13-14	3.9	Municipal Sewage Sludge on Farmland Studies have found municipal sludges, in addition to containing useful nutrients, also contain other man-made chemicals some of which are persistent and likely to accumulate in the soil. EPA research (Healy et al., 2017) has highlighted a number of concerns in relation to the use of 'biosolids' on agricultural land. The effects of many of these substances, e.g. nanomaterials, both individually and in combination with other chemicals, on both human health and the environment are not yet fully understood. As municipal sludge could be a source of food contamination for a range of hazardous substances, the SEA should consider the current use of municipal sludge on food producing soils, taking into consideration approaches to sludge management and reuse in other EU Member States. It is also very timely to review the reuse of sewage sludge on farmland given the recently commenced review process for the EU Directive on the use of sewage sludge in agriculture, see https://ec.europa.eu/info/law/betterregulation/have-your-say/initiatives/12328-Evaluation-of-the-Sewage-Sludge-Directive-86-278-EEC- .	Passed to Strategy development team for consideration.
86	14	3.11	Section 3.11 Landscape, on page 40, in the pressures' subsection, reference is made to 29 counties - this should be corrected to 26.	Noted.
87	14	3.13	We acknowledge the review of the SOER Key Issues and Challenges and highlighting the ones most appropriate to the Strategy. Once the SOER for 2020 is published, we recommend including a reference to taking the updated identified issues and challenges into account, as relevant to the Strategy.	Addressed in Section 4.4 of the Environmental Report.
88	14	3.13	On page 45 of this section, reference is made to increasing NOx and NMVOC emissions and compliance targets. Emissions of both of these pollutants are not included in compliance targets under the NECD as per Article 4 para 3(d).	Corrected in Section 4.4 of the Environmental Report.
89	14	3.14	Data Gaps In Section 3.14 – Information Gaps, we suggest that the EPA SOER 2020, due to be published in November 2020, should be reviewed in the context of taking into account the most recent available information, in preparing and implementing the Strategy.	EPA SOER 2020 has been taken into account in Section 4.3 and 4.4 of the Environmental Report.

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90	14	3.14	We welcome the various environmental maps provided in the Appendix of the Scoping Report. The EPA supported Environmental Sustainability Mapping Webtool (www.enviromap.ie) may also help in showing environmental baseline information across a range of environmental criteria. It has recently been used in preparing the SEA for the National Planning Framework and Regional Spatial and Economic Strategies.	Noted.
91	14	Table 4.1	Chapter 4 – SEA Framework The objectives should capture the contribution the Strategy can make to the specific topic objectives. For example, contribute to the protection of biodiversity and helping reverse the decline in nature, supporting the national effort to address climate change etc. <ul style="list-style-type: none"> • Objective 6, the sub-objective could be reworded as follows “Support achievement of the NECP objectives for ...” • Objective 11, the sub-objective could be reworded “Preserve and enhance the ability of an area to provide services such as carbon sequestration and flood resilience, as well as supporting other ecosystem services” 	Objectives reworded in Table 3.2 of the Environmental Report.
92	15	5.1 and 5.2	Assessment of Alternatives In Section 5 – Alternatives and Scope of the SEA, we acknowledge that the EPA guidance document ‘Developing and Assessing Alternatives in Strategic Environmental Assessment (EPA, 2015)’ has assisted in the consideration of alternatives. We also welcome the findings of the public survey / consultation responses on the 2030 Strategy, that indicated a strong support for environmental sustainability. We also note the alternatives considered for the Strategy. For Alternative 4: Blended Approach (mix of Environment Sustainability and Production/Value), this approach should look to maximise environmentally sustainable agriculture and land management practices over a need to continue to intensification / expansion of unsustainable elements of the sector.	Alternatives reviewed
93	15	5.3	In subsection 5.3, we note the identified potential significant effects of the Agri-Food Strategy. In relation to potential cumulative effects. We recommend that you consult our recent SEA good practice guidance note on Cumulative effects assessment in Strategic Environmental Assessment (EPA, 2020). This may be of use when considering and assessing potential for cumulative environmental effects.	Guidance has been used in assessing cumulative effects in Section 6.5 of the Environmental Report

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94	15	5.4	Scope of the SEA It is recognised that the assessment and selection of the preferred alternative(s) and selection of the relevant mitigation measures, should consider the economic and technical aspects to ensure that the measures are viable and implementable and that the alternatives are realistic.	Noted, the alternatives as defined have been developed with the intention of being viable and implementable.
95	15		In Chapter 6 – Next Steps, we suggest that you consider including a glossary of terms used in the Strategy and the SEA ER. In addition, consideration should be given to including a definition of environmental sustainability in the context of the Strategy as well as describing any commonly used acronyms in the SEA.	A glossary and list of acronyms has been included.
96	15	6.5	Monitoring Considerations Monitoring Implementation of the Programme, (the section title should be amended to reflect that it is a Strategy. The EPA publication Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring (EPA, 2020) may also assist you when looking at these stages of the SEA process for the Strategy. We also suggest that you consider how the environmental monitoring will be used to determine how environmentally sustainability is being achieved over the lifetime of the Strategy.	Guidance has been used in Section 8 of the Environmental Report
97	16	Appendix A	We acknowledge the extensive list of plans, programmes and environmental protection objectives described in Appendix A of the Scoping Report. We suggest that there is also merit in including a reference to the National Wastewater Sludge Management Plan (Irish Water) , in relation to land spreading aspects that may impact or be impacted on, in implementing the Strategy. Additionally, the Pollution Reduction Programmes for Shellfish Waters should also be taken into account, as appropriate and where relevant. Information on these can be found at: https://www.housing.gov.ie/water/water-quality/shellfish-waters/shellfish-waters-finalcharacterisation-reports-and-prps	Addressed in Appendix B of the Environmental Report.
98	16	Appendix A	In relation to the description of the main objectives and requirements of the National Waste Prevention Programme and how it effects or is affected by the Strategy, we suggest a revision of the text in the interests of clarity	Addressed in Appendix B of the Environmental Report.

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99	16	7	In Section 7 – References, (page 58), the text referring to “EPA Catchments Unit (2019) Ireland’s Catchment Flood Risk Assessment and Management (CFRAM) Programme” should be attributed to the OPW, rather than the EPA.	Corrected in Sections 4.3 and 9 of the Environmental Report.
Organisation: Department of Agriculture, Environment and Rural Affairs - Northern Ireland Environment Agency				
Date received: 18 September 2020				
100	1		The scoping in of transboundary issues is welcomed. DAERA would like the SEA Environmental Report to contain a clear statement indicating the opinion about whether or not the implementation of the of the strategy is likely to have a significant effect on Northern Ireland, in combination with any identified measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment.	Trans-boundary effects on Northern Ireland included in assessment section of the SEA ER
101	1-2		Natural Environment Division Comments A number of useful information sources that highlight the current state of the environment in Northern Ireland at a regional level and which could be referenced in appendix A are: Northern Ireland State of the Environment Reports: https://www.daera-ni.gov.uk/publications/state-environment-report-2013 Northern Ireland Environmental Statistics Reports: https://www.daera-ni.gov.uk/articles/northern-ireland-environmental-statistics-report	These reports have been used in compiling the transboundary sections of the baseline in Section 4.3 of the Environmental Report.
102	2	Table 4.1	In terms of the scoping of transboundary SEA issues, the objectives contained in table 4.1 are broad. When refining targets, the potential disturbance to/impact on NI/RoI migratory/mobile species such as salmon (for example within the River Foyle Special Area of Conservation use tributaries which are within both Northern Ireland and the Republic of Ireland), Hen Harriers (in the Slieve Beagh Special Protection Area adjacent to the border), Marsh Fritillary butterfly metapopulations, bats and breeding waders should be given consideration. Cross border peatlands, river basins, European sites in Northern Ireland adjacent to or with pathways to the Republic of Ireland and other landscape types also require special attention as ecological functionality and ‘views’ of landscape cross political boundaries.	Addressed in Table 3.2 and Section 6.6 of the Environmental Report.
103	2		Other relevant web-links are; Designated Scientific Sites: www.daera-ni.gov.uk/landing-pages/protected-areas Regional Landscape Character Map viewer: https://www.daera-ni.gov.uk/services/regional-landscape-character-areas-map-viewer	Noted

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			DAERA have a map browser for NI protected sites and known priority habitat: www.daera-ni.gov.uk/services/natural-environment-map-viewer	
104	2		Appropriate Assessments should refer to the status of habitats and species in the relevant reports available on the JNCC website as follows: UK Article 17 report for the Habitats Directive https://jncc.gov.uk/our-work/article-17-habitats-directivereport-2019/ and the UK Article 12 report for the Birds Directive https://jncc.gov.uk/our-work/european-reporting/#birds-directive-reporting	Covered in the Appropriate Assessment
105	2	Table 2.2	Marine and Fisheries Division Comments Sustainability Topics Explicit reference to designated sites within the marine environment in the subtopic of the Ecology and Nature Conservation topic of Table 2.2 Sustainability Topics is welcomed. However, it seems odd that the statement “including those within the marine environment” does not apply to all the other sub-topics listed within this topic. The reference to “character of coastal areas” is also welcomed within the sub-topic of the Landscape topic.	Marine environment has been taken into account within the other subtopics.
106	3	Table 2.2	The Sustainability Topic on Water would benefit from explicit reference to marine waters within the sub-topic section. This would create a stronger link to the section on Transitional, Coastal (marine) and Canal on page 29, the pressures outlined in relation to offshore marine waters on page 31 and the SEA Objectives / Sub-Objectives on page 46. Similarly, consideration could be given to including an explicit marine reference within the Climate Change sub-topic with respect to global warming on sea temperatures. Within the Natural Capital topic the services provided by the marine ecosystem could also be highlighted.	Noted.
107	3	3	Transboundary Considerations The Report acknowledges (Section 2.6) that consideration of transboundary impacts with Northern Ireland is likely to be particularly relevant with some topics for example, ecology, climate, air, water and landscape and this is further acknowledged in Section 3.13 on Natural Capital. Yet, transboundary considerations have only been included (as sub-headings) in relation to Biodiversity and Nature Conservation and Air Quality within the Baseline Data chapter. It is further advised that consideration should also be given to transboundary impacts with the Northern Ireland marine environment, particularly given the cross border loughs of Carlingford	Addressed in Section 4.3 of the Environmental Report.

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			Lough and Lough Foyle. For example, Baseline Data on Water (section 3.6) includes a section on Transitional, Coastal (Marine) and Canal, yet there is no Transboundary Considerations section for this topic.	
108	3	Table 4.1	SEA Objectives It is important marine aspects within the Sustainability Topics and sub-topics are reflected within the SEA Objectives and sub-objectives outlined in Section 4 and Table 4.1. This will ensure the assessment is robust and transparent in relation to the consideration of impacts on the marine environment and importantly potential transboundary marine environmental effects.	Addressed in Table 3.2 of the Environmental Report.
109	3	Appendix A	It is noted both the DAFM (2012) Harnessing Our Ocean Wealth and DHPLG (2020) draft National Marine Planning Framework consultation have been included within Annex A. Given these inclusions and to take account of transboundary aspects in relation to the marine environment, it is advised that both UK Government (2011) UK Marine Policy Statement and DAERA (2018) draft Marine Plan for Northern Ireland should be included under the NI/UK section. This will strengthen the inclusion and consideration of potential transboundary marine environmental effects within the SEA Objectives and overall assessment.	Addressed in Section 4.2 and Appendix B of the Environmental Report.
110	3-4		Understanding that this is a very wide scale SEA, but possible impacts on the Shellfish Water Protected Areas which are in the Lough Foyle and Carlingford Lough transboundary areas need to be included as they have not been mentioned in the documentation provided. Lough Foyle and Carlingford Lough contain Shellfish Water Protected Areas under Directive 2000/60/EC ("The Water Framework Directive"). These Shellfish Water Protected Areas contain commercial shellfish harvesting areas which must meet stringent bacteriological and chemical standards laid down in the Water Framework Directive (Classification, Priority Substances and Shellfish Waters) Regulations (Northern Ireland) 2015 and the EU Food Hygiene Regulations (EC/852/2004, EC/853/2004 and EC/854/2004). This must be taken into account when assessing any plan/project adjacent to a Shellfish Water Protected Area.	Noted
111	4	3	DAERA Inland fisheries has within our jurisdiction several transboundary waterways the majority of which maintain populations of Salmonids, European Eels, Lamprey and several other species of significance. The main catchments include (but not exclusively) –	Noted, trans-boundary effects considered in assessment stage of the SEA Environmental Report.

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			<p>1) The Skeoge in the Northwest, which drains to Lough Swilly.</p> <p>2) The Erne and the Melvin/MacNean catchment which both drain to Donegal Bay.</p> <p>3) The Castletown catchment with its two main Northern Ireland rivers of the Flurry and the Fane catchments which drain to Dundalk Bay.</p> <p>4) The Blackwater which is part of the Lough Neagh/Bann catchment.</p> <p>These rivers provide both a valuable game and coarse angling resource and also hold a considerable nature conservation and biodiversity value. Any environmental report should include these catchments and examine their potential for improvement and any possible impacts within these transboundary jurisdictions. The report also has the potential to identify mutually beneficially programmes of research and/or conservation. Whilst the report is primarily focussed on the designated sites (e.g. ASSI's, SPA's and RAMSAR's etc.) the opportunity should not be missed to consider ground and surface water bodies and how they are impacted by intensive agriculture and also possible approaches to achieve 'Good Ecological Status' as per the Water Framework Directive. The impacts of aquaculture sites within these catchments and their estuarine and coastal environments should be evaluated in full, for example, how sea lice and other parasites have the potential to significantly impact fisheries interests throughout these transboundary watercourses. Given the transboundary nature of these watercourses there is the potential for co-operation in regard to any legal framework for proposed development or permitting of works within these waterbodies and the potential impacts from such actions.</p>	
112	4-5		<p>The Loughs Agency is the lead body for provision of advice regarding impacts to salmonid and inland fisheries interests within the catchments of Lough Foyle and Carlingford Lough. Consequently, said agency should be consulted in relation to this consultation. DAERA Inland Fisheries will provide fisheries advice for those areas outside of the catchments of Foyle and Carlingford Loughs.</p>	To be consulted during the public consultation of the Environmental Report.
113	5	5.4	<p>Historic Environment Division Comments</p> <p>HED welcome that cultural heritage is to be carried forward to environmental assessment stage. While we advise that we consider it unlikely that there would be direct adverse effects of this programme on Northern Ireland's Historic Environment, we note that as with landscape considerations many cultural heritage characteristics within the landscape have transboundary</p>	To be considered as applicable in the Environmental Report

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			qualities and relationships which add to their understanding, and we highlight the presence of transboundary heritage assets such as historic routeways, earthworks and waterways.- Our historic environment datasets are available at the link below and may aid in environmental assessment. https://www.communities-ni.gov.uk/publications/historic-environment-digitaldatasets	
114	5	5.4	In addition to the above we also highlight the value of considering potential impacts on understanding of transboundary post medieval vernacular heritage and historic settlement patterns, aspects of the historic environment which are very much intertwined with landscape, and which can be indicated through historic ordnance survey maps.	To be considered as applicable in the Environmental Report
Organisation: Department of Agriculture, Food and the Marine - Sea-Fisheries Policy and Management Division				
Date received: 6 November 2020 & 13 November 2020				
115	1		The Scoping Report notes the important role of the agri-food sector in the economy of rural and coastal areas. In particular, the fishing industry (encompassing both fisheries and fish processing) provides valuable employment opportunities in coastal areas where there may be few other employment options. While the Report does make reference to sea-fishing and the marine environment, there is very scant coverage of this area overall	Further baseline data relating to marine and coastal addressed in Section 4.3 of the Environmental Report.
116	1	Appendix A	Under Appendix A: A review of other plans, etc, it is important to include the Common Fisheries Policy (CFP) [Regulation (EU) No. 1380/2013]. The CFP provides the framework for the long-term conservation and sustainability of fish stocks around our shores and is designed to ensure the long-term sustainability of fishing in Ireland and throughout EU waters. Thus providing for the continued economic viability of fishing fleets and fish processing, while supporting the communities that depend on a vibrant fishing industry.	Addressed in Section 4.2 and Appendix B of the Environmental Report.
117	1	7	We note the list of references includes the DAFM (2018) Brexit and the Irish Fishing Industry Factsheet. Please note there is an updated factsheet dated July 2020 which should be referred to instead	Noted, referencing updated
118	2	3	Fisheries come within the scope of the Agri-food strategy -2030, however the document focuses primarily on the agricultural aspect and with only a handful of references to fisheries. Everything the scoping document outlines for the agricultural aspect would also need to be done for fisheries. There are numerous sources of information that the scoping document could use for the fisheries assessment	Information sources have been used where relevant in compiling Section 4.3 of the Environmental Report.

Com Ref.	Page of Letter	Scoping Report Ref.	Comment	Actions Carried out to Address Comment
			<ul style="list-style-type: none"> - The National Seafood Survey (BIM) - The Fishing Atlas - The Shellfish Atlas - The Marine Strategy Framework Directive (MSFD) Article 17 report (including D3- Commercial Fish and Shellfish) - Various Habitats Directive and Birds Directive assessments of fisheries - The Marine Institute (MI) Stock Book and associated Sustainability Statements, the TACs and outtakes etc, Progress towards CFP objectives - The MI has also carried out an Integrated Ecosystem Assessment for Irish waters which covers fisheries, aquaculture and impact of agriculture on the marine environment. This can be passed on to DAFF to set context, priorities and define gaps. 	
119	2	3	Further detail and examples from the text of where further focus on the marine/seafood sector would be required are as follows: Habitat protection/biodiversity characterisation p14-22– A summary of terrestrial and marine species and habitats and status of Natura & Water Framework Directive (WFD), but no mention of MSFD assessment output	Addressed in Section 4.3 of the Environmental Report
120	2	3.2	Policy response p19- biodiversity. The paper lists biodiversity action plan and several specific agricultural schemes (eg GLAS) but no specific coastal /marine policies/schemes	Addressed in Section 4.3 of the Environmental Report
121	2	3.3	Socio-Economic characterisation p22- The breakdown of agriculture sectors could have more details on the breakdown of fisheries/aquaculture sectors for a more balanced summary	Noted.
122	2	3.5	Soil and land use p25+- should there be further reference to aquaculture?	Aquaculture related effects now assessed as part of the relevant measures within the Strategy
123	2	3.6	Water p28- There is detailed reference to WFD, but none on MSFD. The main focus is on agriculture	Addressed in Section 4.3 of the Environmental Report
124	2	3.11	Landscapes p40- There is limited mention of marine/coastal landscapes and their value/pressures - however SEA objectives makes the link to marine landscapes on p47 with reference to the marine harvesting sector	Addressed in Section 4.3 of the Environmental Report

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125	2	3.12	<p>Natural capital p41 does provide information on the marine and freshwater capital</p> <p>For a balanced and comprehensive review on the environment and natural capital, the summaries of the relevant sections of the recent MSFD Article 8-10 submissions can be used - see https://www.housing.gov.ie/water/water-quality/marine-strategy/marine-strategy-framework-directive-200856ec-article-17-update</p> <ul style="list-style-type: none"> For values on natural capital, figures don't seem to be consistent with others in the report and should be used/quoted from single sources, for instance the value of sea fisheries and aquaculture is put at €664 million on p42 but recreational angling is valued at €836 million and supports "11,000 jobs" while the value of Irish seafood industry on p 23 is 1.22billion employing 16k people. 	Noted and discrepancies removed.
126	2	Table 4.1	SEA objectives- p47 biodiversity objectives are very broad- could give more focus on specific critical issues like is done subsequently under WFD;	Noted, SEA objectives are considered suitable for the purpose intended which is to assess the impact of the Strategy on a full range of biodiversity related receptors
127	2	Appendix A	National and EU plans and programmes (Appendix a) include specific marine as well as general/terrestrial plans. Programmes such as CFP must be incorporated. Marine Protected Area plans don't seem to be mentioned although they are in the Programme for Government.	Addressed in Appendix B of the Environmental Report.

Table A2: Public Consultation Comments

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Organisation: An Taisce				
Date received: September 2020				
1	1		OVERARCHING LEGAL CONSIDERATIONS It is submitted that both the draft document circulated and the objective of proceeding with a new ten-year AgriFood strategy is systemically in breach of both national and EU law and will expose the Department and the State to multiple legal actions.	Noted.
2	1		CLIMATE ACTION Since this document was prepared the Irish Supreme Court upheld the action by Friends of the Irish Environment that the National Mitigation Plan does not meet the requirement of the Climate Action and Low Carbon Development Act 2015.	Noted.
3	1-2		THE PROPOSED NEW SEA PROCESS FAILS TO ADDRESS UNRESOLVED ARTICLE 10 SEA OBLIGATION FOR MONITORING AND REMEDIATION OF FOOD WISE 2025 WHICH HAS 5 YEARS LEFT TO RUN Any strategy under the SEA Directive seeking to supersede an existing one at mid term point must address the SEA status and compliance of the existing strategy. Section 1.3 of the RSK the Draft Strategic Environmental Assessment (SEA) Scoping Report fails to address the fact that the existing 10 year strategy Foodwise 2025 which was approved in 2015 has five years left to run. This Government strategy was subjected to the Strategic Environmental Assessment in 2015. Section 1.3 of the RSK Document with regard to Foodwise 2025 states that ONLY 27 % OF TARGETS HAVE BEEN ACHIEVED. In relation to the remainder vague phrases like “commenced or progressing” or “undertaken and ongoing” are used.	Noted.
4	2		Article 10 of the SEA Directive sets out the provisions for monitoring of a programme subject to SEA and obligation for remedial action where unforeseen adverse effects arise. The provisions of Article 10 are not just for monitoring, but notably for the remediation of unforeseen adverse effects. The monitoring which has been carried out by the Department co-ordinated High Level Implementation Committee (HILC) and in particular set out in the May 2020 “Environmental Sustainability Committee Report to the 2030 Agri Food Strategy Group ESC Environmental	Noted.

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			Monitoring". This shows that GHG emissions, dairy cow numbers and fertilizer use in 2019 exceeded the figures for 2020 on which the 2015 SEA process and projections were based. However, no effective remedial action was proposed even on these two impacts as required by Article 10 of the SEA Directive.	
5	2		Irish dairy industry expansion has now passed the tipping point of unsustainability in intensification of nitrate fertiliser grassland; dependence on feed imports; expansion of milking parlours, milk powder and cheese factory processing; and consequent multiple adverse impacts include on human health with ammonia air pollution exceeding EU emission ceiling levels since 2016, increased greenhouse gas emissions, nitrates impacts on water quality, biodiversity impacts including farm bird loss, and inadequate research on chemicals and pesticides.	Noted.
6	2		<p>PREMATURITY OF PROCEEDING WITH SEA CONSULTATION AND ADOPTION OF NEW AGRI FOOD 2030 STRATEGY IN ADVANCE OF ADOPTION OF NATIONAL CAP STRATEGIC PLAN</p> <p>Only passing reference is given to the Cap Strategic Plan process which is progressing. No consideration is provided by RSK as to how the proposed SEA process for AgriFood 2030 is to be integrated with the Irish CAP plan process.</p> <p>In parallel to the drafting for SEA consultation of a new 10 year programme by AgriFood 2030 Strategy Committee, the consultation process for the national CAP Strategic Plan is proceeding with a stakeholder forum which is still at preliminary stage in considering the Needs process.</p> <p>Proceeding with a 2030 AgriFood strategy in advance of the CAP plan, which will need to comply with the EU Biodiversity Strategy 2030 and Farm to Fork Strategy, would be premature.</p>	The 2030 strategy is a separate process to the CAP - it covers a much broader area than the CAP, and while the two processes are running in parallel, they have different mandates. The 2030 Strategy is taking account of the EU Farm to Fork and Biodiversity Strategies.
7	3	1.3, 2.2, 2.7	<p>INADEQUATE DEFINITION OF "STRATEGIC PRIORITIES" IN FAILING TO MEET THE REQUIREMENTS OF THE SEA DIRECTIVE</p> <p>SEA is a legal process. The framework for defining strategic priorities is set out in Annex I (f), which lists the headings under which an SEA is required to be framed. The considerations adopted by the DAFM Committee responsible for the SEA process proposed are set out 4 points under section 1.3.</p> <p>In Chapter 2, Section 2.2 the consultants set out "Sustainability Topics".</p>	Noted.

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			Section 2.7 gives passing reference to “EU Farm to Fork” but none to the EU Biodiversity Strategy to 2030. It is submitted that the considerations set out by RSK are systemically deficient with regard to addressing EU Directives on SEA and air quality, EU food and biodiversity policy, the Paris Agreement 2015 and national climate legislation.	
8	3-4		EU A FARM TO FORK AND EU BIODIVERSITY STRATEGY 2030 The draft document submitted by RSK is not fit for purpose even on its stated objective in providing the ten year AgriFood Strategy to 2030, as it does not properly address the overarching EU policy framework. In May 2020 in furtherance of the 2019 European Green Deal the European Commission published in parallel: “A Farm to Fork strategy for a fair healthy and environmentally friendly food system” and EU Biodiversity Strategy for 2030 - Bringing nature back into our lives”. The draft RSK document gives only passing mention of the of Farm to Fork and none to EU Biodiversity Strategy 2030 in Chapter 2. The 14-point EU Nature Restoration Plan in Section 2.2.9 of the Biodiversity Strategy which set out objectives which are almost entirely applicable to agriculture, fisheries and land use and need to form the basis of all EU and Irish agricultural fisheries and food policy for the decade ahead, No 14 being specific to fishing. Current and continuing nitrate fertiliser grass based bovine agriculture levels in Ireland, is incompatible with these objectives.	Noted.
9	5		EU COURT OF AUDITORS REPORT ON BIODIVERSITY LOSS The RSK Draft does not address the May 2020 The EU Court of Auditors report on the EU wide failure of successive agri-environmental schemes under CAP to reverse biodiversity loss.	Addressed in Section 4.3 of the Environmental Report.
10	5	3	ADEQUACY OF BASELINE DATA SET OUT IN CHAPTER 3 OF RSK DRAFT The Current State of Ireland’s Environment RSK have not set out adequate baseline considerations in Chapter 3 of the Draft document under the headings set out in Annex 1 (f) of the SEA Directive (Schedule 2 of the Irish SEA regulations) on the current state of the environment.	Noted.

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11	5-6	3.2	<p>Ecology and Nature Conservation</p> <p>The following are not addressed:</p> <ul style="list-style-type: none"> • Data on insect and pollinator decline from National Biodiversity Data Centre and other sources, with consequent issues of fertiliser, slurry spreading and herbicide use and land management generally; • Particular farm bird species population decline; • 6 yearly Article 17 Report from Ireland to European Commission in August 2019 on status of habitats and species with critical data on adverse agricultural impacts; • Assessment of Biodiversity impact of exceeding of EU ammonia air pollution thresholds since 2016 with 2% annual increase 98% caused by agriculture impact on priority habitats under Habitats Directive on designated peatlands in particular; • Data on ecological impact on aquaculture and seaweed and kelp harvesting; • Overview of overfishing impact; • The considerations on transboundary impact from Northern Ireland (p13) does not address high ammonia emissions in NI. 	<p>The relevance of these issues is noted but the baseline is meant to be a high level summary at the same scale as the Strategy, these issues are considered to be incorporated in the analysis.</p>
12	6	3.3	<p>Socio-Economic</p> <p>Data is not provided on employment and welfare conditions and health protection of workers in agriculture, factory processing and fisheries sectors including fishing boats.</p>	<p>The relevance of these issues is noted but the baseline is meant to be a high level summary at the same scale as the Strategy, these issues are considered to be incorporated in the analysis.</p>
13	6-7	3.4	<p>Data on health exposure of workers in agricultural facilities with high ammonia air pollution levels, and potentially greater exposure impact to respiratory diseases and viruses in view of exceeding of EU Ammonia air pollution thresholds since 2016 with 2% annual increase 98% caused by agriculture is required.</p> <p>Healthy working conditions for meat factory works, which have been highlighted by COVID 19 are not addressed.</p> <p>In February 2019 international coverage was generated on the issue of the ill-treatment and exploitation of migrant workers in the Irish fishing industry.</p> <p>UN special rapporteurs stated in a warning letter to the Irish government that Ireland's</p>	<p>The relevance of these issues is noted but the baseline is meant to be a high level summary at the same scale as the Strategy, these issues are considered to be incorporated in the analysis.</p> <p>The SEA team has been notified of further mediation in relation</p>

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			permit scheme for migrant workers on its fishing trawlers breaches international human rights law. The four UN rapporteurs – on modern slavery, trafficking in persons, racial discrimination and human rights – joined together to issue an exceptional rebuke to the Irish government, saying they had received information that the permits were making migrants from outside the EU vulnerable to modern slavery and serious abuse on Irish fishing vessels.	to the issue of migrant workers in the fishing industry.
14	7	3.5	No consideration is provided on: <ul style="list-style-type: none"> • Level of increased carbon loss from horticultural peat extraction and use of peat for animal bedding, in Ireland and for export; • Impact of horticultural peat extraction on drinking water; • Carbon loss in high carbon soil from land drainage for agricultural land use change; • Carbon soil erosion in areas affected by agricultural land burning. 	The relevance of these issues is noted but the baseline is meant to be a high level summary at the same scale as the Strategy, these issues are considered to be incorporated in the analysis.
15	7	3.6	Water EPA and other data on meeting of water quality, including continuing decline of high status waters with consequent impact on fertiliser, slurry spreading and herbicide use and land management generally is not cross-referenced with evaluative data on nitrate excess. No consideration is given to exceedances of trihalomethanes (THMs) in drinking water supplies in Ireland when organic matter, such as suspended peat sediment from horticultural peat extraction sites, are treated with chlorine at water treatment plants.	Noted but peat extraction not anticipated to be within the scope of the strategy.
16	7	3.7	Air The policy response on breaching of EU ammonia air pollution ceiling thresholds since 2016 with 2% annual increase, 98% caused by agriculture is referenced. However, there is no consideration provided on the adequacy of the draft DAFM farm code (page 27) which is voluntary, and how nitrates are to be reduced to at least below EU ceiling levels.	The relevance of these issues is noted but the baseline is meant to be a high level summary at the same scale as the strategy, these issues are considered to be incorporated in the analysis.
17	7-8	3.8	Climatic Factors Ireland's Environmental Protection Agency has reported that from 2011 to 2018 (the most recently reported year) agricultural nitrous oxide emissions increased by 18% and methane increased by 15%. The primary driver has been an increase in reactive nitrogen usage via fertiliser and feed in sector-driven intensive cattle farming, particularly dairy. Synthetic	The relevance of these issues is noted but the baseline is meant to be a high level summary at the same scale as the Strategy,

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			<p>nitrogen fertiliser imports increased by 38% over this period.</p> <p>In additional to the GHG emission accounting under the current EU system, the full post 2027 calculation of Land Use Change will require accounting.</p> <p>The RSK considerations do not address additions GHG impact of carbon soil loss for land use change inclusion horticultural peat extraction and land drainage.</p> <p>Pages 20 and 29 on adaptation in referring to disruption due to “prolonged periods of rainfall drought and snow” do not address the impact of 2018 drought in causing a fodder crisis requiring increased animal feed import and use of peat for animal bedding because of straw shortage and vegetable harvest impact.</p>	these issues are considered to be incorporated in the analysis.
18	8	3.9	<p>Material Assets</p> <p>The considerations set out by RSK do not address:</p> <ul style="list-style-type: none"> • Increased disease risk to industrial animal and crop agriculture, as shown by 2020 Co Monaghan Chicken Flu; • Debt risk and sustainability of investment in increased milk production and beef and dairy processing in creating “stranded assets”; • Greenhouse gas migration or “carbon leakage” as the Dutch Cheese company Royal A Ware and Norwegian TINE seek to locate processing plants in Ireland; • Potential of fishing vessels being unusable because of requirement to meet marine conservation fish population targets. 	The relevance of these issues is noted but the baseline is meant to be a high level summary at the same scale as the Strategy, these issues are considered to be incorporated in the analysis.
19	8	3.1	<p>Cultural heritage including architectural and archaeological heritage</p> <p>No consideration is given to impact of currently unregulated horticultural and animal bedding peat compost extraction and agricultural land reconfiguration on archaeology.</p>	Noted but peat extraction not anticipated to be within the scope of the Strategy.
20	8	3.11	<p>Landscape</p> <p>No consideration is given to</p> <ul style="list-style-type: none"> • Effectiveness of DAM Regulations on hedgerow and field boundary removal; • Landscape impact of increased bovine animal housing. 	The relevance of these issues is noted but the baseline is meant to be a high level summary at the same scale as the Strategy, these issues are considered to be incorporated in the analysis.
21	9	3.12	<p>Natural Capital</p> <p>RSK seek to look at the “ interrelationships between the sustainability topics”.</p>	Natural capital topic has been expanded further to include

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			<ul style="list-style-type: none"> • Health impact on workers in agricultural processing facilities and increased ammonia levels; • The impact of nitrates reaching a tipping point in water quality and biodiversity impacts; • Health interrelationship between healthy diet and access to clear air; and • Nitrates impact on aquaculture. 	interrelationships between sustainability topics.
22	9	4.1	SEA FRAMEWORK The 11 SEA Objectives set out in Section 4.1 under SEA Objectives are systemically deficient in the quantified timetabled and targeted objectives required and not fit for purpose. The ineffectuality and vagueness of language of what is set out in the 11 tabulated boxes particularly evident for Water, Air Quality, and Climate Change.	The SEA objectives have been drafted following guidance.
23	9	4.1	Any agri food strategy must address a range of internationally and EU defined targets and objectives on climate, biodiversity, nitrates and water as well as public health.	While the Strategy is being framed within the context of various targets referred to, measures to address targets are subject of separate policy documents.
24	9	Table 4.1	For Objective 5, Water, the table merely states protecting and improving water quality rather than stating the requirement for Ireland to meet its commitments to the Water Framework Directive by 2027. Agriculture is responsible for the greatest pressure on water. Intensification and expansion of animal agriculture since 2010 under Irish agri-food strategy policy has greatly increased this pressure on water quality. Therefore it is grossly inadequate to merely aspire to protect and improve water quality from a current basis that is already damaged and degraded by policy since 2010. RSK fail to note the key requirement to limit total synthetic fertiliser inputs to agriculture to reduce nutrient loading nationally.	Addressed in Table 3.2 of the Environmental Report.
25	9	Table 4.1	Similarly for Objective 6, Air Quality, the stated aim to “support improvements in air quality” is grossly inadequate given Ireland has been breaching its NECD ammonia limit since 2016 and the EPA and EU Commission have stated that proposed measures will not reduce ammonia emissions sufficiently to meet the target in future. Bringing ammonia back under EU emission ceiling levels is a legal obligation as well as public health and biodiversity loss reversal imperative.	Addressed in Table 3.2 of the Environmental Report.

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26	9-10	Table 4.1	For Objective 7, Climate Change, it is extremely troubling that RSK state “[s]upport the agrifood sector in reducing its GHG footprint per unit of output”, which indicates that RSK are unaware that climate change impact depends on absolute total agriculture sector emissions, not on an efficiency footprint measure. In the absence of a reducing cap on total emissions such an efficiency focus merely enables cost savings that are reinvested to increase production and emissions. Since 2011, methane emissions are up 15% and nitrous oxide emissions are up 18%, despite constant policy and strategy measures focused on footprint improvement.	Noted.
27	10	Table 4.1	Also for Objective 7, Climate Change, the phrasing “Support land management practices that protect and capture carbon, particularly from peatlands and forests” is extremely weak. It fails to clearly state the critical distinction that prioritising immediate measures to prevent ongoing carbon losses from land use is of far greater climate action priority than policy supporting slow, uncertain and impermanent sequestration measures. Ongoing carbon losses from organic soils under pasture are 6 MtCO ₂ /year and from peat extraction for horticulture 2 MtCO ₂ /yr. Managed forestland in Ireland is already a net source and afforestation is slow so near-term restrictions on forest harvest are needed to prevent carbon loss.	Noted.
28	10	5.1	CONSIDERATION OF ALTERNATIVES The 2030 Committee membership, as for 2025 Food Wise, is heavily biased toward agri-food industry vested interests with only a single environmental NGO member among over 30 members. It is grossly negligent for this scoping document to fail to highlight this inadequate and improper lack of independence in defining “reasonable alternatives”.	The scoping stage was open for public consultation giving all stakeholders an opportunity to input. Strategy Committee representation is outside of the remit of the scoping process.
29	10	5.2	This is a false statement. Recorded data since 1990 for Ireland’s agriculture sector shows that it responds extremely quickly to policy changes. As the chart below shows the Irish agri sector is primarily responsive to the total amount of nitrogen fertiliser being used nationally, which drives ruminant production and resultant methane emissions and nitrogen pollution (nitrous oxide, ammonia and nitrates). EU policy from 1998 to 2011 based on intensification and the milk quota ensured emission reductions, but Ireland’s agri-strategies since 2010, designed by the agri-food industry has reversed these policies at the	Noted

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			cost of increasing climate, air and water pollution. Therefore, reversing the current strategy and first limiting total nitrogen inputs to the 2011 level and following a path continuing the 1998–2011 trends in nitrogen and cattle numbers would be and obvious, evidence-based reasonable alternative.	
30	11	5.2	There no such widespread desire and none at all among environmental NGOs. This statement is based only on the answers to the biased leading questions in the Public Consultation. If the respondents had been first made fully aware that environmental indicators have been increasingly negative under the existing approach it is very likely that a fully engaged consultation with a much greater population sample would have arrived at very different results. At the very least the scoping document could comment on this possible likely bias.	Noted.
31	12	5.2	As has been pointed out in a peer-reviewed article by Kenny et al. 2016 the “sector-driven” Irish strategies since 2010 have seen a “distinct absence of public health representation in the process, an avoidance of some key public health challenges and the dominance of a ‘business as usual’ approach”. In the opinion of eNGOs including An Taisce the same is true for the inadequate approach of the strategy committees and strategies to environmental and climate concerns.	The Strategy is taking a food systems approach
32	12	5.2	Contrary to the assertion of RSK the public consultation cannot be taken to indicate a clear support for the 2030 Strategy. Nor are the proposed Reasonable Alternatives given in the scoping document in any way adequate to be used in an SEA. Nor is the sector-driven 2030 Strategy Committee sufficiently independent to review any proposed SEA alternatives.	Noted
33	12	5.2	On p.41, Alternative 2 is the only “reasonable alternative” stressing environmental factors whereas three others are merely variations on the business-as-usual approach of intensification and dairy expansion under Food Wise 2025. This is a grossly inadequate alternative that is not reasonably supported. Even if the detail has yet to be defined for Alternative 2 it is extremely unclear from this description what this alternative means even in qualitative terms. Comparing this alternative on the basis of a fractional change of FW2025 and only emphasising added "promotion of greater sustainability in food production and processing" is not a reasonable alternative. It suggests that marketing promotion of claims is the aim rather than real, immediate and long-term	Alternatives reviewed

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			improvements in the environmental indicators that have been damaged by Irish sector-driven agri-strategies since 2010.	
34	12	5.2	<p>In fact, given the reversal since 2010 of previously improving environmental and emission trends, the most reasonable alternative would be to reverse the strategy direction since 2010 by first limiting total synthetic nitrogen inputs to the 2011 level immediately (below 300,000 tN) and showing a path continuing the 1998–2011 trends in nitrogen and cattle numbers.</p> <p>This is an evidence-based reasonable alternative to the sector-driven strategy since 2010 that is far more likely to meet climate, ammonia and water targets in the near term. It is essential that the reasonable alternative meets these targets very quickly, primarily by limiting total synthetic nitrogen inputs in Ireland (which increased by 38% from 2011 to 2018).</p>	Noted.
Organisation: Association of Farm & Forestry Contractors in Ireland				
Date received: September 2020				
35	1		Farm & Forestry Contractors in Ireland have a key role to play in providing cost-effective and efficient mechanisation services to allow Ireland to remain a world leader in the production, management and marketing of low carbon, high-quality sustainable and traceable food. Through our judicious investments in modern low-emission and high output farm machinery, Farm & Forestry Contractors are playing their part in supporting in maximising farm production efficiency whilst minimising the effects on the climate and reducing the environmental footprint of agriculture. This fact needs to be recognised in the Agri-Food Strategy 2030.	Considered by the Strategy development team
36	1		Our FCI members are early adopters of scientific research and the best practices at farm level. Contractors have also a track record of working in partnership with their farmer clients and farm advisors, as we strive to achieve national climate goals. We believe that Farm & Forestry Contractors can play a very significant part in a national collaborative effort to ensure a just lower carbon transition for all Irish farmers. This strategy needs to be recognised and incorporated into the Agri-Food Strategy 2030,	Considered by the Strategy development team
37	2		As the providers of a dominant amount of the mechanisation services on Irish farms we can work together in new technical and management partnerships with farmer clients and their	Considered by the Strategy development team

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			advisors, to ensure long-term sustainability, from an economic, social and environmental perspective. All such partnership discussions must now include the knowledge and expertise of Farm & Forestry Contractors to adequately inform farm advisory programmes.	
38	2		Support for Farm & Forestry Contractors to invest at a more rapid pace, in newer more fuel efficient machinery systems that guarantee a reduction in the average carbon footprint, and lower ammonia emissions needs to be examined. At FCI we believe that the Department of Agriculture, Food and the Marine should use the opportunity for the review of the Agri-Food Strategy 2030 to help the agri-food sector achieve the maximum possible progress in climate change mitigation and adaptation, and reduction of greenhouse gas emissions, consistent with commitments at EU level. Farm & Forestry Contractors can play a significant role in achieving this vital progress.	Considered by the Strategy development team
39	2		At FCI we would contend that the uniquely valuable Farmer: Contractor relationship brings huge performance improving added value to the production on Irish farms, because the very survival of the Farm & Forestry Contractor depends on the performance on the farm. This investment in the profitability of Irish farms, through constant Farm & Forestry Contractor tangible investment in more efficient machines and better work practices, is more far more intrinsically linked to the continued growth in decades of Irish farm output than some of the advice provided by those operating at arm's length from the farm gate.	Considered by the Strategy development team
40	2		Ammonia Reduction Farm & Forestry Contractors in Ireland support the action of enhancing soil fertility and nutrient efficiency by reducing nutrient loss to the environment during slurry spreading. As contractors are the dominant providers of slurry spreading machinery systems and apply the bulk of the 40 million tonnes (Mt) of animal manures produced annually on Irish farms, we believe that working in partnership with farmers, the Department of Agriculture, Food and the Marine and advisory services that the target of 60% of all slurry spread by low emissions slurry spreading by 2022; 75% by 2025; and a longer-term ambition of 90% can only be achieved through active policy partnership programmes with Farm & Forestry Contractors.	Considered as part of Climate and Air Roadmap
41	2		We believe that it is important to support the role of the Farm & Forestry Contractor to invest in new slurry spreading Low Emission Slurry Spreading (LESS) technology in the same	Outside scope of Strategy

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			way that farmers are supported. Contractors will do most of the work, provide economies of scale on farms and use more modern, low emission tractors to power this machinery. We believe that in the absence of equality and fairness in support programmes for investment in LESS machinery, that all grant aid for the systems should be suspended immediately.	
42	3		Currently, the Department of Agriculture, Food and the Marine (DAFM) oversee and administer the Targeted Agricultural Modernisation Schemes (TAMS) which supports capital investment in a number of target areas. FCI believes that current TAMS grants for the purchase of low emission slurry spreading equipment should be withdrawn and replaced with more targeted grants for increased farm nutrient storage.	Outside scope of Strategy
43	3		Irish Farm & Forestry Contractors have not invested in higher technology slurry management machinery to the same extent as their European counterparts due to the presence of the farmer-focused machinery grant aid system which is making investment in more accurate and more efficient spreading systems that incorporate Precision Farming systems with high levels of transparency, uncompetitive.	Outside scope of Strategy
44	3		FCI believes that there must be more investment in education for farmers on slurry management rather than on the purchase of slurry spreading machinery. FCI believes that there is a need for farmers to understand that not all animal slurry is the same. There are significant operational differences in slurry agitation and spreading for current low emission slurry spreading systems, based on real-world Irish conditions where baled silage is being fed to animals in slatted sheds.	Considered by the Strategy development team
45	3		FCI believes that currently in the region of 40% of slurry on Irish farms is not suitable for use with the dribble bar/trailing shoe system. This confirms that there needs to be some changes to the management of the slurry, not to the machines. Many trailing shoe systems are not considered to be farmer friendly, due to maceration blockage issues. These machines can only function to their optimum design specification in the hands of skilled Farm Contractor operators.	Considered by the Strategy development team
46	3		FCI believes that the current GLAS grant aid scheme should be extended to all farmers to use Farm Contractor based Low Emission Slurry Spreading (LESS) systems. FCI proposes a voucher grant support system for the use of Farm Contractor LESS systems. If all LESS slurry spreading was grant aided based on Farm Contractor invoices, not just to the GLAS farmers,	Outside scope of Strategy

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			the cost to the Government would be significantly less. The cost to the state of the current GLAS limited voucher system at €1.20/ cubic metre for 50% of the slurry to be spread by LESS systems would be €15 million per annum and it would be guarantee that the low emission systems were being used and would be fully traceable.	
47	3		<p>The scale of Irish farming (farm size) does not justify the investment in Precision Farming technology, which will be essential for all farms in achieving compliance. This approach would support Farm Contractors to invest in the use of the technology, such as the John Deere HarvestLab system, and costing in the region of €20,000, it would help to provide assured traceability of the quantities and quality of animal manure products spread on farmland.</p> <p>This grant/voucher proposal would also allow the creation a national register of Farm Contractors under the scheme who could then avail of technology updates through Knowledge Transfer systems (from which they are currently excluded) to ensure continuous improvement in the standards of manure application strategies.</p>	Outside scope of Strategy
48	4		FCI is suggesting some flexibility to use the splash plate spreading system for part of the work of slurry spreading, but only early in the spring. There are often practical difficulties in spreading the first loads from slatted shed slurry pits, due to under capacity issues which in turn lead to agitation difficulties. These sheds do not have the capacity to allow for the dilution of high dry matter slurries during agitation prior to spreading and these high dry matter slurries cannot be effectively land spread using the current LESS machine systems.	Outside scope of Strategy
49	4		<p>Precision Farming (PA) Technology</p> <p>There should be support to stimulate the wider use of PA technologies will be necessary to eliminate the negative impacts of the small farm scale. If no such supportive action to improve the uptake of PA technologies for farms below 100ha (average farm size in Ireland 32.4ha) were to be taken, it could become increasingly difficult for these farms to compete with farms in the USA, Canada and New-Zealand or even with larger Irish farms, all of which invest in PA technologies. Not only could smaller Irish farms thus lose their competitiveness. They might struggle to comply with greening targets and EU environmental policy goals.</p>	Considered by the strategy development team
50	4		PA technologies are one of the most efficient tools to improve sustainability and productivity in farming. PA technologies offer solutions to produce more with less and	Considered by the Strategy development team

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			<p>enhance food security and safety. Practically, PA technologies provide farmers with extra sensors which give them more information on how to manage natural variations like weather conditions, pests, insect and fungal infestation.</p> <p>Some of the most prominent environmental benefits of PA technologies are:</p> <ul style="list-style-type: none"> • Preventing ground water pollution by optimizing manure and chemical spraying • Reducing fresh water withdrawals with precision irrigation • Limiting crop damages by responding rapidly and effectively to pest, fungal infestation • Allowing new types of poly culture (critical to stimulate biodiversity, noticeably for pollinators) 	
51	4		<p>Some PA diagnostic technologies are already highly affordable and thus available to smaller farms thanks to smart phones or tablets and their applications. Such applications can directly signal a problem on the field or connect to an online service for further probing. Other fundamental PA technologies are less available to smaller farms and should therefore be promoted by the Agri-Food Strategy 2030. These technologies can be divided in three categories:</p> <ol style="list-style-type: none"> 1. Guidance Systems 2. Variable Rate Applications (VRT) & Nutrient Sensing 3. Precision Livestock Farming (PLF) Technologies <p>Each of these technologies offers distinct advantages in terms of sustainability and profitability for farmers.</p>	Considered by the Strategy development team
52	4		<p>Fuel use & CO2 Reduction in Farm & Forestry Contracting in Ireland</p> <p>Farm & Forestry Contractor services provide a unique value-added component to the chain of Irish agricultural production ensuring the competitiveness of Irish agricultural production through the use of efficient and modern lower carbon machinery systems. We estimate that the proposal to increase Carbon Tax to €80 per tonne will add a minimum of an extra €100 million to the cost of our services at the final stage of this tax with incremental increases from the level proposed this year of €6/tonne, which in itself will mean increases in the costs of our services to Irish farming as we can no longer absorb the increasing fuel costs.</p>	Taxation outside the remit of the Strategy

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53	5		CO2 emissions are highly correlated to fuel use. Almost all of the carbon in diesel fuel is emitted in the form of CO2 efficiency in converting fuel (diesel) into usable energy is one of the main demands of Farm & Forestry Contractors. Therefore, improving fuel economy has been and will be one of the main drivers for innovation. As a result CO2 emissions in agricultural machinery applications have substantially decreased in the last decades.	Noted
54	5		Summary of Achievable CO2 Reductions Farm & Forestry Contractors remain excluded from the Carbon Tax Rebate System, (Finance (No.2) Act 2013 Edition - Part 23) which is open solely to farmers. This is despite the fact that our members carry out 90% of the farm mechanisation work on Irish farms consuming close to 350 million litres of green diesel annually valued at €262 million. This alone is 62% of the total energy bill for the entire Irish agricultural sector based on the total expenditure on energy and lubricants increased by €33.8 million (+8.7%), increasing from €390.2 million in 2017 to €424.1 million in 2018. (Source: Dept. of Agriculture Annual Review & Outlook 2019).	Outside the remit of the Strategy
55	5		Farm & Forestry Contractor Agricultural Knowledge and Innovation Systems Agricultural Knowledge and innovation Systems (AKIS) have a key role to play in meeting challenges faced by agriculture and rural areas. Farm & Forestry Contractors are often excluded from this process so that new technology systems are not being address to the key operators so that new technology opportunities are insufficiently applied in practice especially among smaller farmers. There is need involve Farm & Forestry Contractors in new knowledge and innovative solutions to achieve quicker innovation and better uptake of existing knowledge to achieve climate and productivity objectives. Farm & Forestry Contractors can play an important role in supporting the digital transition in agriculture through the use of scale-efficient farm machinery resources.	Considered by the strategy development team
56	5		The Association of Farm Contractors in Ireland (FCI), research has shown that Farm & Forestry Contractors in Ireland employ close to 10,000 people operating machines on farms. Farm & Forestry Contactors use more than 350 million litres of diesel annually (61% of total agricultural energy consumption) in carrying out this farm work and operate more than 20,000 modern and fuel efficient tractors. Contractor machines harvest 90% of the Irish silage crops each year along with managing the sustainable spreading more than 20 billion	Considered by the Strategy development team

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			litres of slurry, as well as establishing and harvesting many different crops. Farm & Forestry Contractors can play a significant role in partnership with farmers, the Department of Agriculture, Food and the Marine and advisory services as we work together to provide workable solutions to the significant challenges that Ireland faces in attempting to its climate change and air quality targets. The important role of Farm & Forestry Contractors needs to be recognised and incorporated into the Agri-Food Strategy 2030.	
Organisation: BEET Ireland				
Date received: September 2020				
57	3	2.7	It is noted that the SEA Scoping Report provides a comprehensive backdrop to the current policy framework and it highlights significant challenges currently facing the industry. This backdrop must also be considered in the context of the recent Government Programme for Government, Our Shared Future	Addressed in Section 4.2 and Appendix B of the Environmental Report.
58	3	1.3	Committee Approach These themes are all critically important for the future of the agri-food industry in Ireland. The challenge ahead is how these themes are aligned against the objectives set out in current Government policy and the SEA objectives.	Noted.
59	3		Horticulture It is noted that horticulture is referenced once in the document, in Appendix A. This is a serious oversight and must be addressed in the next stages of policy development. The sectors relating to mushrooms, potatoes, vegetables, protected crops and amenity production play an important role in the agri-food industry however they have been ignored in the SEA Scoping document.	Addressed in Section 4.3 of the Environmental Report.
60	3	3.9	Baseline Data In the context of the above it is noted that while there has been some increase in the number of AD facilities in Ireland since 2014, the opportunities that exist for increasing the level of AD adoption in the agri-food sector has not been underpinned by appropriate Government policies. Accordingly Ireland has not seen the widespread adoption of AD technologies in the agricultural sector and this remains a lost opportunity. It is noted that a significant bioethanol production opportunity if the Government and fuel industry move from E5 to E10. The proposed biofuels blending obligation of 11% from	Noted.

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			January 2020 is simply a recognition of the status quo for today's biofuels deployment in Ireland, i.e. 5% real use of ethanol in petrol plus 7% real biodiesel, which is reported as 14% under double counting. This is not an appropriate policy to bring about significant environmental benefits. A 12% obligation from 2020, instead of 11%, would bring E10 petrol into the system.	
61	5-6	5.2	<p>Alternatives</p> <p>The above illustrates a flawed assumption in terms of Foodwise 2025. It is clear from the current Government Programme and Climate Change policy documents and the baseline data outlined in the scoping document that any Strategic Environmental Assessment must place an increased emphasis on environmental sustainability. However the assumption that "the continuation of the 2025 Food Wise priorities either in full or part" is seriously flawed, when considered against the baseline data. As noted above the impact of key elements of the Food Wise 2025 is causing serious negative environmental problems. It is therefore not reasonable to conclude that the proposed base case is appropriate.</p> <p>It is clear from the above that neither Alternative 1 or Alternative 3 are appropriate for the next stages of the SEA analysis. It is further noted that these 2 alternatives are not in keeping with the EPA Recommended Guidelines for Alternative Assessments.</p> <p>Alternative 2 seeks to consider this option in comparison with 2025 Food Wise as the baseline case. The development of Alternatives with 2025 Food Wise as the base case is seriously flawed.</p>	Alternatives reviewed
62	5-6	5.2	<p>It is therefore recommended that alternatives be considered in the context of the 2030 and 2050 climate change targets that the current Government has signed up to. In this context it is suggested the following alternative scenarios be considered:</p> <ol style="list-style-type: none"> 1. Alternative Base Case <ol style="list-style-type: none"> a. Use the year 2020 as the current base case and reference year to define current status of industry. 2. Alternative Sustainable Approach <ol style="list-style-type: none"> a. Assume the 2030 Government climate change and biodiversity targets as the benchmark to be achieved and outline the range of policies required to meet these targets. 3. Alternative Sectoral Approach 	Alternatives reviewed

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			<p>a. Taking a sectoral approach to the agri-food industry, define the role as well as challenges and opportunities facing the creation of “A climate smart, environmentally sustainable agri-food sector”</p> <p>4. Alternative Material Assets Approach</p> <p>a. Taking a land & sea use and material assets approach, define how Ireland can take a 2050 horizon timeline which will ensure that the agri-food sector is aligned with Government Programme to “sustainability at the heart of our fiscal, enterprise, innovation, and environmental policies.</p>	
63	6		<p>The framing of the current scoping exercise will define the direction of the final SEA and this will play an important role in guiding the future 2030 Agri-Food policies. Insufficient consideration was given to the 2025 Food Wise SEA analysis and this resulted in significant conflicts between production expansion and environmental impacts. The current SEA scoping analysis is therefore very important.</p>	Noted.
Organisation: Heseltine Institute for Public Policy, Practice and Place, University of Liverpool				
Date received: September 2020				
64	1		<p>On the 31 July 2020, the Supreme Court quashed the National Mitigation Plan (NMP) 2017. Food Wise 2025 was a key part of the NMP in respect of the so called “sustainable intensification” of Irish agriculture. The Supreme Court ruled that the successor to the NMP must set out, with a sufficient level of detail, how Ireland will achieve the National Transition Objective by 2050. The successor strategy to Food Wise 2025 must unequivocally do this. The Teagasc MACC mitigation measures, as included in the subsequent Climate Action Plan, have thus far failed to have any meaningful effect whatsoever on rising agriculture emissions.</p> <p>The recently negotiated Programme for Government proposed a new Climate Act which will mandate an average -7% per annum emissions reduction to 2030 (~50% over a decade) with legally binding 5-year carbon budgets. Each sector, particularly agriculture which accounts for ~30% of total ESD emissions, will be required to develop a clear strategy to achieve its sectoral target.</p> <p>It is simply not credible , or possible, to expand the agricultural productivism in the context of the scale of rapid emissions reductions that Ireland is required to make. Agriculture will</p>	Considered as part of Strategy Development

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			be required play its part. The overarching agri-food strategy to 2030 must be one of sustainable DE-intensification.	
65	1		Ireland also has legally binding emissions under the National Emissions Ceiling Directive to reduce ammonia emissions. 90% of ammonia coming from animal manure. Failure to implement policies to reduce ammonia emissions will expose Ireland to legal action to force it to comply. Any successor strategy to Food Wise 2025 must include such policies.	Considered as part of Agri Climate and Air Roadmap
66	1		Ireland further has legally binding requirements under the Water Framework Directive. According to the EPA, agriculture continues to be a major cause of declining water quality. Again, failure to implement policies to reduce water pollutants from agriculture will expose Ireland to legal action to force it to comply. Any successor strategy to Food Wise 2025 must include such policies.	Considered as part of Strategy Development
67	1		It is unimpeachable from readily available empirical evidence (EPA) that the agriculture productivism promoted by Food Wise 2025 is incompatible with environmental limits and legally mandated requirements pursuant to EU law. This cannot continue.	Considered in the Development of the Strategy
68	1		The EU has signalled a clear direction of travel for post-2020 CAP through the Farm to Fork strategy. This proposes a radical reorientation of agricultural policy away from headlong productivism towards a more holistic land-use management approach and rewarding farmers for environmental goods. This direction of travel is only going one way.	Considered in the Development of the Strategy
69	1		Ireland needs to use this opportunity to strategically reset agricultural policy through a fundamental change of approach and to maximise income to farmers through early adoption of this new paradigm. We need to shun our reflex as a reluctant jurisdiction on environmental protection. Failure to do so will simply store up significant costs for the future and make the challenge of the inevitable transition away from the flawed expansionary agricultural model of the past decade much more difficult.	New Strategy takes a food systems approach
70	1		No doubt Ireland's high-emission agri-industrial complex will rail against and stymie the policies required. The choice for the Government is between the short-term profiteering and predatory delay of corporate interests, and the long term viability of Irish food production.	Noted.
Organisation: Irish Farmers Association				

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71	2		Irish agriculture rightly has a global reputation for high environmental standards. It is important that the Strategic Environmental Assessment (SEA) fully recognises the positive actions taken by farmers and builds on these to further improve the sustainability of the sector.	Addressed in Section 4.3 of the Environmental Report which identifies the various schemes which have been taken up by farmers.
72	2		<p>Positive actions taken by farmers</p> <p>Irish farmers are fully engaged with sustainable agricultural practices and committed to climate action. The actions undertaken by farmers clearly demonstrate their willingness to improve sustainability and to actively contribute to climate change mitigation, when focussed supports are introduced. Some of the actions being undertaken by farmers to meet the environmental challenges of reducing greenhouse gas (GHG) and ammonia emissions, increased carbon capture, improved water quality, protecting and improving biodiversity include:</p> <p>All farmers in receipt of a basic payment maintain their land in Good Agricultural and Environmental Condition (GAEC) across a range of areas.</p> <p>As highlighted in the SEA Scoping Report, 50,000 farmers participate in the Green Low Carbon Agri Environment (GLAS) Scheme, The GLAS scheme makes a positive difference for the climate, water quality and biodiversity in the following ways:</p> <ul style="list-style-type: none"> •Almost 13000km of watercourses will be fenced off from livestock. •Almost 46000ha of traditional hay meadow will be planted. •Almost 240,000ha of carbon sequestering low-input permanent pastures will be created, •360km of arable grass margins, as well as 62km of riparian margins will be created. Over 212,000 carbon assessments have been completed on farms using the Teagasc/Bord Bia carbon navigator as part of Bord Bia's Origin Green Programme. 	Noted.
73	2		Farmers have also moved beyond the regulatory environmental obligations, participating in voluntary programmes such as Smart Farming, the Agricultural Sustainability Support and Advisory Programme (ASSAP) and European Innovation Partnerships, such as the BRIDE Project. Such proactive engagements by farmers to improve their farms sustainability have resulted in:	Noted

Com Ref.	Page of Letter	Scoping Report Ref.	Comment	Actions Carried out to Address Comment
			<ul style="list-style-type: none"> - Almost doubling of phosphorous use efficiency over the past two decades. - Ireland has the 23rd lowest nitrogen surplus of the EU with the 6th highest water quality. - Ireland's dairy farmers having the lowest greenhouse gas GHG emissions per kilo of output in the EU. - Ireland's beef and dairy farmers are in the top five for lowest GHG emissions per kilo of output. - Farmer demand for ammonia reducing equipment (Low Emission Slurry Spreading) currently exceeds supply. - Farmers have fully taken up all air quality and climate action policy measures. 	
74	2		Any environmental assessment that evaluates environmental consequences must be logical and identify actions that can build on Irish agricultures green credentials whilst maximising the economic growth of the agri-food sector in an environmentally sustainable way. Irish farming has and will continue to play its part when it comes to addressing environmental challenges.	Noted.
75	3		Improving Farm Sustainability Farmers can improve the environmental sustainability of their farms if properly supported.	Noted.
76	3		Introduction of Sustainable Development Programme Funding is required to introduce a Sustainable Development Programme (SDP) to co-ordinate the delivery of price supports for farm-scale and community-based renewables and to ensure the maximum delivery of the Teagasc MACC climate roadmap. This roadmap sets out key measures to displace on farm fossil fuel use, to recognise carbon sequestered by the sector and to support greater farm level efficiency.	Outside Strategy remit
77	3		Improved Low Emissions Slurry Spreading Scheme The existing Low Emissions Slurry Spreading (LESS) scheme, which while currently well backed by farmers, requires additional support to escalate action to address air quality (ammonia) challenges. IFA proposes that: <ul style="list-style-type: none"> - That the overall grant aid available for individual farmers is increased to 60%. - That the separate limit to general TAMS is increased. 	Outside Strategy remit

Com Ref.	Page of Letter	Scoping Report Ref.	Comment	Actions Carried out to Address Comment
			<ul style="list-style-type: none"> - That it remains a strong measure in future environmental schemes. - That investment in LESS equipment is VAT exempt. 	
78	3		<p>Support increased use of protected urea, lime, slurry additives and soil aeration technologies</p> <ul style="list-style-type: none"> - The use of coated or protected urea is recommended by Teagasc, to help address climate and ammonia challenges. They report that using protected urea can reduce ammonia losses into the atmosphere by 80% compared to standard urea. Protected urea is more expensive and is less readily available to purchase. To encourage uptake, an incentive scheme should be introduced to close the differential gap and includes an additional top up incentivise uptake of protected urea. - Lime is an important element to neutralise the acidity in Irish soils and restore them to optimum soil pH, which supports crop growth and overall soil quality, whilst reducing risk of run-off and nutrient losses. Two thirds of soils are at sub-optimum pH levels. As per the Programme for Government Commitment, there is an urgent need for the Department to introduce a liming scheme to support use on Irish farms, as suggested by Teagasc. - Slurry additives applied in winter slurry storage are recognised by Teagasc as helping to reduce emissions. Such slurry additives are costly and some farmers have questioned the efficacy of the claims made by the slurry additive suppliers. A support should be put in place to encourage slurry additives uptake, and Teagasc or the Department should publish an annual list of slurry additive products that they have tested and that deliver the outcomes claimed. - Soil structure is critical in determining the provision of nutrients, water and air in soil as this is dictated by soil structure. Soil aeration can speed up the recovery process by improving drainage, air diffusion and root exploration, which in turn promotes growth. The introduction of supports for soil aeration equipment will benefit soil structure and production. 	Considered in development of Agri Climate and Air Roadmap
79	4		<p>Expansion of current sustainability schemes</p> <ul style="list-style-type: none"> - In 2019, the average cost savings identified on participating farms that took part in the Smart Farming Programme was €6,300 with associated GHG reductions of 10%. As recommended in the Joint Oireachtas Climate Action Committee Report Climate Change: A 	Outside Strategy remit

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			<p>Cross-Party Consensus for Action March 2019, the programme should be developed and expanded³.</p> <ul style="list-style-type: none"> - The Beef Data and Genomics Programme (BDGP) has been effective in improving the efficiency of the national suckler cow herd. This scheme must be simplified and built upon with an increase in the allocation for the scheme. The Irish Cattle Breeding Federation (ICBF) estimate that by 2030, the genetic gain achieved through the programme will reduce GHG emissions by 14% per kg of beef produced⁴. - The GLAS scheme is oversubscribed, which demonstrates the willingness and interest of farmers to participate in agri-environment schemes. Farmers are enthusiastic about seeking ways to improve the sustainability of their farms and they must be supported with a payment for delivering the public service beyond income forgone and cost incurred. 	
80	4		<p>Support for anaerobic digestion and on-farm renewables</p> <p>Micro-energy, anaerobic digestion, farm-scale and community renewable energy projects have all been recognised for a long time as important tools to displace fossil fuel use in rural areas, reduce environmental risks (water, air, climate) and generate alternative income streams. In 2019, their important role was highlighted in the Oireachtas Committee on Climate Action Cross-Party Consensus for Action report.</p> <p>If the potential of on-farm renewables is to be realised the following measures are required:</p> <ul style="list-style-type: none"> - The Department of Housing, Planning and Local Government should review existing planning obligations, for all on-farm renewable projects, to bring planning requirements in line with other EU Member States. - Tiered supports are required for the development of anaerobic digesters, ranging from farm scale (up to 0.5MW), to community/small co-op scale (0.5MW - 2MW) and large co-op (5MW). - The provision of a Capital Grant in the order of 50%-60% which is ring fenced from existing farm supports - Development of a Feed-in Tariff paid on the metered output - Planning exemptions for farmers for small scale developments. One-stop advice clinics should be provided to assist project developers to submit successful applications. 	Outside Strategy remit

Com Ref.	Page of Letter	Scoping Report Ref.	Comment	Actions Carried out to Address Comment
81	4		Carbon sinks from forests, permanent pastures and hedgerows must be fully counted The positive climate impact achieved through carbon sinks, such as forests, hedges and permanent pastures, are currently not fully counted. This has led to an unbalanced picture of agriculture's climate impact. For example, afforestation since 1990 will remove an estimated net 4.5m tonnes of CO ₂ from the atmosphere per annum, over the period 2021 - 2030. Yet the climate value of this will not be fully recognised, but any changes in methane and cattle numbers will be fully counted. The Department of Agriculture, Food and Marine must further incentivise carbon sinks on farms and these sinks, associated with forestry, hedgerows and permanent pasture , must be counted when measuring agriculture's climate contribution.	Considered by the strategy development team
82	5		In addition to identifying positive actions that can be built on to improve sustainability at farm level, it is important that the SEA considers the environmental consequences of proposed plans or programmes within a wider context considering "transboundary impacts" beyond the island.	Addressed in Section 6.6 of the Environmental Report.
83	5		Within Ireland, the Environmental Protection Agency (EPA) are tasked with reporting and monitoring Ireland's environmental performance, which is submitted to the European Union (EU) and the United Nations (UN) on an annual basis for review. When documenting trends such as GHG the accounting methodology must be in line with the Intergovernmental Panel on Climate Change (IPCC) guidelines for National GHG inventories, As part of this methodology, methane and other GHGs are currently accounted for using the GWP (Global Warming Potential) methodology. However, it is questionable as to how appropriate this methodology is in accurately depicting the GHG's warming effect on the planet. Under current policies, long and short lived GHG are treated as being interchangeable, when in-fact the warming effect on the planet between long and short lived GHG is very different. Taking methane as an example, it has a strong warming potential early in its life cycle but then diminishes rapidly within approximately 10 - 12 years. In comparison to carbon dioxide, the warming affect is much lower but extends over a longer timeframe of approximately 1,000 years and accumulates in the atmosphere long after it was emitted from the source,	Noted.

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84	5		As climate research continues to evolve, policies must also evolve to more effectively align GHGs and their effects on the warming of the planet. Research from the University of Oxford proposes a more accurate method of evaluating the climate impact of short lived GHGs, such as methane known as GWP*. In evaluating this evidence base, the GWP* calculation should be adopted at national, EU and UN levels,	Noted.
85	5		Aside from the counting methodology used to report on GHGs, it is questionable if targets used are framed within the correct units for the benefit of the overall global environment. Under the effort sharing legislation, GHG reduction targets were set, focusing solely on reducing absolute or total emissions from sectors such as; transport, agriculture, infrastructure and waste. While the focus on overall emissions is important, this does not account or consider the efficiency of production from the use of resources. For example, the carbon footprint of a kilo of beef or milk produced.	To be considered in the Strategy development
86	5		Reducing overall emissions is critical, although GHGs do not respect national and EU boundaries as recognised in the SEA to some degree through "transboundary" movements. Policies must ensure that in the movement to reduce overall emissions, aligned with targets, that this is not having a contrary consequence on emissions globally.	To be considered in the Strategy development
87	5-6		Examining this in the context of agriculture and food production, the demand for food is rising with the world population predicted to grow to 9.7 billion by 2050. Therefore, in a shift to lower overall emissions, it would be counterproductive to limit carbon efficient food production in a country such as Ireland, as market demands would be replaced from countries that have a higher carbon footprint. This is commonly known as carbon leakage. Teagasc estimate that a 50% reduction in Irish beef being displaced by South America would lead to a further net 3.6 million tonnes of GHG emissions.	Noted.
88	6		It is of paramount importance that policies do not hinder sustainable food producing countries in the aspirations to meet absolute or 'total' reduction targets that disguise efficient use of resources. The emphasis should be on carbon efficiency, environmental and economic sustainability.	To be considered in the Strategy development
89	6		The agri-food sector plays a vital role in the Irish economy and within rural Ireland. From the earlier sections of this submission, the proactive engagement and willingness to adopt sustainable practices by farmers is affirmative. Equally of importance, is that this willingness	Noted.

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			at farm level is supported by addressing the three pillars of sustainability in equity. The financial and social aspect of sustainability is often secondary to the environmental aspect.	
90	6		The capabilities and potential of one pillar is limited by the resources of another, put simply, farmers cannot be green while their finances are in the red. Consumers willingness to pay for environmental services in food produced to the highest standards, must match any ambitions put forward. There is a need for public money for public goods, and it is of fundamental importance that a pre-emptive approach is taken in addressing concerns raised in the draft and final SEA through the many actions and measures identified in this submission.	To be considered in the Strategy development
Organisation: Irish Water				
Date received: September 2020				
91	1	3.6	Water availability Irish Waters responsibility involves providing over 3.9 million customers with an average of 1.7 million litres of drinking water each day via a network of 1,208 groundwater and surface water abstractions, 788 individual water treatment plants and 63,000 kilometres of distribution network. Historically this service was provided by 31 individual local authority water service functions. Under this management model, water supplies in many areas developed over time on a reactive basis, based on the need in the immediate vicinity. As a result, outside the main urban centres, water supplies are generally characterised by a fragmented network of isolated supplies, often abstracting from relatively small waterbodies, causing reliability / sustainability issues and the potential for environmental impact.	Noted
92	2	3.6	The situation, although manageable in the short term, will become increasingly untenable due to population growth, competing needs for water within catchments (including changes to agricultural land use), more stringent environmental conditions on water abstraction, and climate change impact. In addition to this, although as a country our average rainfall is relatively high, it is unevenly distributed, with more in the west than the east. The areas with lowest rainfall happen to have the greatest population density (although this density is low compared to European norms), and also have the most intensive agricultural	Noted

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			production. This means that water resources in our more populated areas are locally under pressure.	
93	2	3.6	As part of our first supply demand balance assessment, we have identified that, based on our current water supply assets, over 50% of our water supplies are currently in deficit or will fall into deficit at some stage over the next 25 years if we do not intervene. This means that the reliability of our water supplies is suboptimal and that, if we do nothing, our existing customers will experience interruptions to supply with increasing frequency, and our ability to cater for population and economic growth could be impacted. Consideration should be given to proactive multi-stakeholder resource planning at a catchment level, to ensure that these future challenges can be met.	Noted
94	3	3.6	Integrated Catchment Management Irish Water prepares Drinking Water Safety Plans (DWSP) which seek to protect human health by managing risks to water quality, taking a whole catchment approach to manage risks from source through to the tap. Both the World Health Organisation (WHO) and the EPA strongly endorse the Drinking Water Safety Plan approach to managing drinking water supplies effectively in the interests of public health. Protection of the water source is the most effective way of reducing the cost of water treatment. Catchment management is a process that recognises a catchment as the appropriate unit for understanding and managing land, water and ecosystems and guides people towards an agreed vision for their catchment, and towards acting together to manage it. Water quality in catchments is impacted by multiple pressures, from various sources including wastewater and agriculture. A balanced approach between the sectors is required, with impacts from wastewater services and agriculture being addressed as part of a coordinated approach in each catchment, towards the achievement of agreed water body objectives.	Noted.
95	3	3.6	A number of pesticides have been detected in low concentrations in a large number of rivers across Ireland over the past number of years. With the proposed intensification of agricultural production, there is a risk that pesticide usage may increase, with a resultant potential increase in drinking water supplies with Pesticide failures. DAFM have been working with Irish Water as part of the National Pesticides and Drinking Water Action Group (NPDWAG) to promote the use of Integrated Pest management and to follow best practice	Addressed in Table 3.2 of the Environmental Report.

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			when using any pesticide product, especially in the vicinity of a drinking water source. To ensure that agricultural production is environmentally sustainable we would propose that the catchment management approach promoted by the EPA and other stakeholders in Ireland should be incorporated in the SEA and include actions / commitments in relation to the sustainable use of pesticides.	
96	3	3.6	Water: include a subsection on baseline water availability and discuss baseline of pesticides in catchments	Pesticides is discussed as one of the main pollutants impacting on waterbodies in Section 4.3 of the Environmental Report.
97	3-4	3.13	Include the following issues: o Increased detections in pesticide pollution, much of which is linked to agricultural activity o Risk of reduced water availability due to climate change	Noted
98	4	Table 4.1	Under objective number 5 include an objective relating to the protection of drinking water sources.	Addressed in Table 3.2 of the Environmental Report.
99	4	Appendix A	Include Irish Water plans (https://www.water.ie/projects-plans/our-plans/), in particular: o Irish Water Water Services Strategic Plan o Irish Water National Water Resources Plan (when published	Addressed in Section 4.2 and Appendix B of the Environmental Report.
Organisation: Projects Policy Advocacy				
Date received: September 2020				
100	1	3.2	European sites, also known as Natura 2000 sites...': the preamble here notes N2K sites and elsewhere refers to habitats but the text omits the overarching Article 2 objective of the Habitats Directive as explicit on the need to restore all Annex I habitats (and Annex II species) to favourable conservation status at Member State level - not just in N2K (SAC & SPA) sites. I believe and the SEA should establish that there are very large areas of Annex 1 habitats outside of N2K sites. Article 10 of the Habitats Directive specifically covers obligations beyond N2K sites. This reemphasises the need to assess impacts beyond N2K sites and indeed to do this in the context of improving the ecological coherence/favourable conservation status of the whole Natura 2000 network (i.e. including all Annex 1 habitats).	Addressed in Section 4.3 of the Environmental Report.

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			This context - of improving the ecological coherence/favourable conservation status – of Annex 1 habitats should be reflected in the section: Conservation Status (Page 16).	
101	1	Table 4.1	SEA Objective: 1. Ecology and Nature Conservation – Protect, restore and support Ireland’s unique biodiversity assets – the table should explicitly reflect my above points about Annex 1 habitats by adding a further bullet along the lines: Improving the ecological coherence/favourable conservation status of Annex 1 habitats outside N2K sites.	Addressed in Table 3.2 of the Environmental Report.
102	1	5.2	Add a further scenario: an alternative to the #EUGreenDeal in agriculture is the production line and the unlimited race for the intensity and mass production of agricultural production. At the end of this race, there will be no more family farms, but large agro-industrial networks.	Noted, alternatives text is as provided by Strategy development team

APPENDIX B: STATUTORY CONSULTATION RESPONSES

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Organisation: Department of Environment, Climate and Communications - Geological Survey Ireland				
Date received: 9 June 2021				
1	1	Table 3.2	We are pleased to see areas of natural heritage importance, including geological heritage sites taken into consideration in Table 3.2 of the Environmental Report.	Noted.
2	1		We would like to draw your attention to the series of county geological heritage audits now completed for 23 of the 26 counties. Geological heritage highlights the importance of geodiversity (which typically underpins the biodiversity of many ecosystems) at local and national level. Our geological Heritage data sets can be viewed online under the Geological Heritage tab on the online Map Viewer.	Noted.
3	1	Table 3.2	In Table 3.2: SEA Objectives of the Environmental Report, SEA Objective 10, 'Landscape – Protect, enhance and manage the character and quality of Ireland's Distinctive landscape and seascape', we note the sub-objectives b. "Maintain and enhance designated sites, including Ireland's six National Parks and two World Heritage Sites' and c. 'Maintain and enhance cross border landscapes". We would like to highlight the three UNESCO Global Geopark Programmes (Copper Coast, Burren and Cliffs of Moher, and the cross-border Marble Arch Caves), and aspiring geopark project (Joyce Country and Western Lakes). We would welcome consideration of the inclusion of UNESCO global geoparks, and IUCN Guidelines for geoconservation in protected and conserved areas; This best practice guideline, number 31 in the series, is the first to address a fundamental part of nature - geodiversity and geoheritage and its protection and conservation following the broadening of the IUCN definition of a protected area to embrace all of nature.	Geoparks added to objectives in Table 3.2.
Groundwater				
4	1	Section 4.3	We welcome the inclusion of specific references to our groundwater comments and datasets within Section 3.6 of the Scoping Report and Section 4.3 of the Environmental Report	Noted.

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5	1/2	Table 3.2	In Table 3.2: SEA Objectives of the Environmental Report, we note within the SEA Objective 5. 'Water', the subobjective 5a, to "Protect drinking water and other water resources from pollution, particulate nitrate and phosphorous pollution with no further deterioration of water quality status" and sub-objective 5b, to "Support the Water Framework Directive objectives of preventing deterioration, achievement of good ecological status by 2027 and achieving compliance with the requirements of designated protected areas". The SEA should consider any potential impact on specific groundwater abstractions and on groundwater resources in general.	Update made to Section 6.5 on to clarify impacts on water include groundwater.
Geochemistry of soils, surface waters and sediments				
6	2	Table 3.2	In Table 3.2: SEA Objectives of the Environmental Report, we note SEA Objective 4. 'Soil and Land Use – Protect and enhance soil quality'. We would like to draw your attention to the activities and datasets of the Tellus Programme.	Noted.
7	2		Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Tellus is a national scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland, at an average sample density of 1 sample per 4km ² on a regular sampling grid across all land uses.. At present, mapping consists of the border, western and midland regions. Data is available at https://www.gsi.ie/enie/data-and-maps/Pages/Geochemistry.aspx	Noted.
8	2		This page also hosts urban geochemistry mapping (Dublin SURGE project), Geochemical Mapping of Agricultural and Grazing Land Soil of Europe (GEMAS) and lithogeochemistry (rock geochemistry) from southeast Ireland datasets. Geological Survey Ireland and partners are undertaking applied geochemistry projects to provide data for agriculture (Terra Soil), waste soil characterisation (Geochemically Appropriate Levels for Soil Recovery Facilities) and mineral exploration (Mineral Prospectively Mapping). The objective of Terra Soil is to produce a suite of mapped products on nutrient and trace element availability (Morgan's and Mehlich's tests) and soil properties such as drainage characteristics and carbon content. The research will be disseminated through the	Noted.

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			relevant Teagasc Advisory services from 2024 and will cover the northern 50% of the country in this initial phase.	
Geophysical Data				
9	2		Geological Survey Ireland produces high-resolution geophysical data (Magnetic field, electrical conductivity, natural gamma-ray radiation) of soils & rocks as part of the Tellus programme. These data currently cover approximately 75% of the country and provide supporting geological information on a regional scale useful for assessing environmental impact and risk.	Noted.
Geohazards				
10	2	Table 3.2	In Table 3.2: SEA Objectives of the Environmental Report, in SEA Objective 4. 'Soil and Land Use – Protect and enhance soil quality', to consider the inclusion of geohazards such as landslides. Geological Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated Map Viewer. Coastal Vulnerability while seen as a potential geohazard, is discussed in more detail under our Marine and Coastal Unit information below.	Geohazards added to objectives in Table 3.2.
Marine and Coastal Unit				
11	2	Table 3.2	in Table 3.2: SEA Objectives of the Environmental Report, we note within the SEA Objective 5. 'Water', the subobjective 5d, to "Support the Marine Strategy Framework Directive achievement of good environmental status by protecting and improving the quality of marine waters, particularly those involved in seafood growing and fishing". We would like to highlight the projects and datasets of our Marine and Coastal Unit which will be of benefit to the SEA.	Noted.

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12	2		<p>Our marine environment is hugely important to our bio-economy, transport, tourism and recreational sectors. It is also an important indicator of the health of our planet. Geological Survey Ireland's Marine and Coastal Unit in partnership with the Marine Institute, jointly manages INFOMAR, Ireland's national marine mapping programme; providing key baseline data for Ireland's marine sector.</p> <p>The programme delivers a wide range of benefits to multisectoral end-users across the national blue economy with an emphasis on enabling our stakeholders. Demonstrated applications for the use of INFOMAR's suite of mapping products include Shipping & Navigation, Fisheries Management, Aquaculture, Off-shore Renewable Energies, Marine Leisure & Tourism and Coastal Behaviour.</p>	Noted.
13	3		<p>INFOMAR also produces a wide variety of seabed mapping products that enable public and stakeholders to visualize Ireland's seafloor environment https://www.infomar.ie/maps/downloadable-maps/maps. Story maps have also been developed providing a different perspective of some of the bays and harbours of the Irish coastline https://www.infomar.ie/maps/story-maps/exploring-dingle-bay-different-perspective. We would therefore recommend use of our Marine and Coastal Unit datasets available on our website and Map Viewer</p>	Noted.
14	3		<p>The Marine and Coastal Unit also participate in coastal change projects such as CHERISH (Climate, Heritage and Environments of Reefs, Islands, and Headlands) and are undertaking mapping in areas such as coastal vulnerability and coastal erosion. Further information on these projects can be found at here</p>	Noted.
Coastal Vulnerability Index				
15	3		<p>Geological Survey Ireland is undertaking a new coastal vulnerability mapping initiative. Maps produced by this project will provide an insight into the relative susceptibility of the Irish coast to adverse impacts of sea-level rise through the use of a Coastal Vulnerability Index (CVI). Currently the project is being carried out on the east coast and will be rolled out nationally, detailed information and maps are available here. These index-based maps will offer a simple, easy visual representation of sensitive areas based on robust methods and conceptualised metrics from latest research, adapted to the Irish context.</p>	Noted.

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Organisation: Department of Agriculture, Food and the Marine - Sea Fisheries Policy and Management Division				
Date received: 11 June 2021				
16	1		Pg. 34: On the wording around the fisheries element of TCA, suggest text in red could be added "The agreement sets out a phased period where the transition to a new quota share will take place for certain stocks involving significant reductions, with an overall quota reduction for the EU Fleet of 25%, with 60% of this reduction applying in 2021."	Amendments made to Strategy text.
17	1		Pg. 41: We suggest the following amendment to the third sentence: "Designed to manage a common resource, it gives all European fishing fleets equal access to EU waters and fishing grounds, subject to allocated fish quotas, and allows fishermen to compete fairly."	Amendments made to Strategy text.
18	1		Pg. 65: Under Mission 1, Goal 5: Action 1: Develop a successor to "Harnessing our Ocean Wealth". This wording could give the impression that DAFM is the lead on this. However, the Department of an Taoiseach is the lead Department for the development of the new integrated marine sustainable development plan. Suggesting re-phrasing to "Contribute to the development of a successor...."	Amendments made to Strategy text.
19	1		Pg. 65: Under Mission 1, Goal 5: Action 2: Typo in second last sentence: "This includes for the setting of annual TACs for most commercial fish stocks from which national quotas are derived."	Amendments made to Strategy text.
20	1		Pg. 65: Under Mission 1, Goal 5: Action 4: Typo in the second last sentence: "While the UK is now an independent Third Country, the TFA TCA commits to..."	Amendments made to Strategy text.
21	1		Pg. 88: There are now 5 fisheries Producer Organisations	Amendments made to Strategy text.

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Organisation: Department of Environment, Climate and Communications - Inland Fisheries Ireland				
Date received: 14 June 2021				
22	2		The Irish Pollan (<i>Coregonus Pollan</i>) 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 (<i>Salvelinus alpinus</i>) 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.	Noted.
23			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	Covered in Section 4.3 of the Environmental Report.

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			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.	
24	4	Section 8	<p>IFI welcomes your monitoring proposals as contained in Section 8 of the Environmental Report and notes the following:</p> <ul style="list-style-type: none"> • the High-Level Implementation Committee (HLIC), as the Managing Authority, to monitor significant environmental effects of implementing the Strategy. • An Environmental Working Sub-Group should be established to oversee monitoring, review and reporting of environmental issues and report back to the HLIC. • Goal 3: Protect high status sites and contribute to achieving good water quality and healthy aquatic ecosystems, as set out in the Water Framework Directive - Monitor nitrogen fertiliser usage rates over the Strategy period to establish if rates fall (as Action 1), regional / catchment area reporting should be adopted where possible to match the recorded achievements to the areas of greatest urgency (as identified by the baseline. <ul style="list-style-type: none"> - Increase the overall amount of water bodies monitored. - Monitor nitrogen and phosphorus levels of waterbodies, especially those already known to be affected by agriculture. - Annual reporting around on farm chemical fertiliser use in relation to herd numbers. - Annual reporting on Agri-Environment scheme take-up through the new RDP with specific reporting of uptake by more intensive farms where uptake has previously been lowest (Action 4). - Publication of National Soils Strategy (as Action 5). 	Noted.

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25	4		<p>Scope of the SEA: IFI endorses the selection of sustainability topics as outlined in the main document (Draft Agri-food Strategy - Executive Summary – Narrative - Sustainability – Economic, Environmental, Social – (ii) Environmental Sustainability – page 19). We also note the following have been considered in the Environmental Report.</p> <ul style="list-style-type: none"> • 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 	Noted.
26			<p>Inland Fisheries Ireland are supportive of sustainable aquaculture in Ireland. A large body of scientific publications have demonstrated that the current popular model of open net pen aquaculture has not been sustainable and has caused considerable negative impacts to wild salmonid populations. Ireland also has obligations under the NASCO Convention including its goals on sea lice management and containment, and under the EU Habitats Directive to safeguard wild salmon stocks from the impacts of marine salmon farming. Therefore, it is the view of IFI that when the environmental issues are set out, it will be evident that for salmon aquaculture to be sustainable over the 2021-2030 period and beyond, a clear change in approach will be required to more sustainable production systems that minimise and eliminate actual and potential negative impacts to our wild salmonids.</p>	Noted.

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27	5		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.	Noted.
Organisation: Department of Agriculture, Environment and Rural Affairs - Northern Ireland Environment Agency				
Date: 15 June 2021				
28	1		The layout and content of the Environmental Report is well laid out and straightforward to follow. DAERA is content that the environmental report and the process of consultation follows the SEA Directive. The draft Agri-Food Strategy 2030 and accompanying Environmental Report have been made available to relevant designated authorities, including transboundary bodies and the public. DAERA is happy previous consultations, including the SEA scoping, are documented in the appendixes and the actions relating to each of the comments detailed.	Noted.
29	1		A description of the current state of the environment and how this relates to the proposed Framework is included within the environmental report. Appropriate environmental objectives / targets / indicators for each of the likely environmental receptors is addressed including consideration of alternatives, an assessment of significant impact and complemented with mitigation measures and monitoring programme.	Noted.

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30	2		NED note that the Agri-Strategy 2030 is limited to the Republic of Ireland and welcome the acknowledgement that consideration has been given to transboundary environment effects within the SEA.	Noted.
31	2	Section 6	NED note the specific locations for environmental effects are unknown at this stage and as such detailed, specific environmental assessment is not possible. NED welcomes that as a matter of good practice mitigation are suggested for all identified uncertain or adverse effects, despite the statutory SEA process only requiring the mitigation of significant effects.	Noted.
32	2		Full assessment relating to the types of impacts and effects will have to be undertaken when specific project details and locations are known. We welcome that this is acknowledged within the report and that specific environmental effects will be addressed in detail at project stage, which is likely to require further consultation with DAERA should projects/programmes, be proposed that may have an effect on Northern Ireland. NED are of the opinion that there should be a solid commitment within the SEA report and the Natura Impact Assessment to consult with the relevant authorities in Northern Ireland at project level should transboundary effects be identified or likely. We understand that transboundary effects are the same as those outlined in the report and therefore are content with the assessment of the likely impacts, should a project have potential for effects on NI.	Update made to Section 7.3 of the Environmental Report.
33	2		Please note following the decision of the United Kingdom to leave the European Union, the collective term of “Natura 2000” sites the network of European protected sites are now known as “National Site Network” sites within the United Kingdom, and this is including Northern Ireland.	Clarified in Section in 3.3 of the Environmental Report.
34	2	Natura Impact Statement	NED welcome the inclusion of an Appropriate Assessment and the consideration of Transboundary concerns. As stated in reference to the SEA, specific project details and locations are unknown, any impacts that are likely to become transboundary impacts are the same as detailed in the assessment and therefore we are content with the mitigation measures on SAC, SPA and Ramsar sites. Please note above reference to the renaming of Natura 2000 sites to National Site Network.	Noted.

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Drinking Water Inspectorate Comments				
35	2	Section 4.3	The Drinking Water Inspectorate has considered the content and note that it is acknowledged that there is potential impact on Water in relation to transboundary effects (Section 4.3). Furthermore, as Noted. in communication reference No. 94 by Irish Water, they prepare Drinking Water Safety Plans (DWSPs) which seek to protect human health by managing risks to water quality, taking a whole catchment approach to manage risks from sources through to tap. Similarly, under Article 7 of the Water Framework Directive, all catchments within Northern Ireland are considered Drinking Water Protected Areas (DWPA) and so, no works should impact on the quality or quantity of the catchment waters. Consultation with Northern Ireland Water (the water undertaker for Northern Ireland) should be completed to ensure that transboundary areas are accounted for in their DWPA plans and discuss any potential impacts to catchments and reservoirs used for Drinking Water supply.	Noted.
Marine Plan Team Comments				
36	3	Section 4.3	While SEA Topics have remained unchanged it is observed that the Summary of Baseline Data in Section 4.3 includes marine transboundary considerations in relevant topics. Reference to the 2014 Northern Ireland Regional Seascape Character Assessment in the landscape transboundary considerations section could have been included, along with the references to AONBs.	Updates made to Section 4.3 of the Environmental Report
37	3	Table 3.2, Section 4.4 and 6.6	It is further observed in Table 3.2 that a number of the SEA Objectives and subobjectives include marine aspects and this is welcomed. The recognition given to marine transboundary effects in section 4.4 on Key Environmental and Sustainability Issues and section 6.6 on Transboundary Effects is also welcomed.	Noted.
38	3	Appendix B	It is noted that references to the UK Marine Policy Statement and the draft Marine Plan for Northern Ireland have been included in Appendix B.	Noted.

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Department for Communities (DfC) Historic Environment Division (HED) Comments				
39	3	Section 6.6	HED provided comment on the SEA Screening report for the Draft Agri-Food Strategy 2030 in August 2020, welcoming that cultural heritage impacts would be considered at the environmental assessment stage. While we considered it unlikely, that there would be direct adverse effects of the strategy on Northern Ireland's Historic Environment, we Noted. that as with landscape considerations, many cultural heritage characteristics within the landscape have transboundary qualities and relationships which add to their understanding. Transboundary heritage assets such as historic routeways, earthworks, waterways, post medieval vernacular heritage and historic settlements are intrinsically linked with and enrich the character of the surrounding landscape.	Noted. - As below.
40	3	Section 6.5	The cumulative effects of the strategy for cultural heritage, as outlined in Pg.123 concludes the overall effects of the strategy to be negligible, though some potential beneficial and adverse effects have been identified. We note however that the potential for indirect transboundary effects on cultural heritage have not been addressed as part of the summary of baseline data (p.35/36) or in the consideration of transboundary effects (para 6.6 p.125).	Addressed in Section 6.6 of the Environmental Report
41	4	Section 6.2	In the interests of ensuring a consistent and balanced approach towards impacts on cultural heritage and its relationship with the surrounding landscape, HED recommends that transboundary cultural heritage impacts are considered in the report, particularly in relation to: - Mission 1, Goal 1, Action 7 - scaling up renewable energy schemes at farm level, considering potential effects on the setting of designated and non-designated heritage assets, including historic landscapes and impact on buried archaeological assets (third paragraph p.111) and - Mission 2, Goal 1, Action 32 in relation to erection of polytunnels and glasshouses considering potential effects on the setting of historic landscapes and cultural heritage features.	Addressed in Section 6.2 of the Environmental Report.

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42	4	Section 6.6	We would refer to our Historic Environment datasets, maintained by HED on behalf of the Department for Communities, which provide an important evidence base to assist in the assessment of the scope of transboundary cultural heritage effects. Our datasets include recorded designated and non-designated heritage assets and are available at: https://www.communities-ni.gov.uk/publications/historic-environment-digital-datasets . They can also be accessed via our Historic Environment Map Viewer https://www.communities-ni.gov.uk/services/historic-environment-map-viewer	Noted.
Organisation: National Parks and Wildlife Service				
Date received: 5 June 2021				
43	4	Natura Impact Statement	The Department notes that a Natura Impact Statement (NIS) has been prepared by consultants ADAS on behalf of the Department of Agriculture, Food and the Marine. The NIS sets out at a high level the impacts of agriculture on biodiversity and the potential pathways for impact arising from the Draft Strategy. It does not however identify which European sites are subject to likely significant effects from the Draft Strategy nor does it set out how the measures proposed will operate to ensure that European sites are protected. The Department is of the view that while measures included in the Draft Strategy to address impacts to biodiversity are most welcome it is entirely unclear what the impacts of such measures will be on European sites. In particular it is not clear that the measures proposed are sufficiently specific and targeted to ensure that negative impacts to European sites are avoided. It is therefore the Department's view that it is not possible to conclude with any certainty that the Draft Strategy will not adversely affect the integrity of a European site or sites.	The final Strategy now includes mitigation measures of the AA.
44	4		The Department notes the Environmental Report that has been prepared as part of the process to prepare the Draft Strategy and acknowledges the integration of environmental issues and concerns into the preparation of the Draft Strategy as a result of this process. The Department notes the examination of Alternatives that has been undertaken and the decision made to choose the alternative which provides for a "Balanced Approach" to sustainability in the preparation of the Draft Strategy. While the Department welcomes the clear recognition of the environmental challenges for the sector, and welcomes the many measures included in the Draft Strategy to address these issues, it is not clear that	The role of the SEA is to assess the Strategy as proposed, not to regulate the implementation of other policy drivers.

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			the measures included in the Draft Strategy are sufficient to ensure that the sector becomes climate-neutral by 2050, and that there will be sufficient and verifiable progress by 2030 in addressing the key issues of emissions, biodiversity and water quality.	
45	5		The Department would welcome an opportunity to meet with the Department of Agriculture, Food and the Marine in relation to the development of the Draft Strategy and the environmental assessment processes which are currently being undertaken. You are requested to send any further communications to the Development Applications Unit (DAU) at manager.dau@housing.gov.ie , or to the following address: The Manager, Development Applications Unit (DAU), Government Offices Newtown Road, Wexford, Y35 AP90	Noted.
Organisation: Environmental Protection Agency				
Date received: 16 June 2021				
46	7		The SEA environmental report clearly outlines the contents and main objectives of the Strategy. Many aspects of the baseline description outline the relationship to the agriculture sector. The SEA objectives/framework are also clear and the proposed monitoring is achievable.	Noted.
47	7		There may be merit in publishing the scoping report alongside the environmental report and the Strategy on the DAFM website to enhance transparency and accessibility. The scoping report includes detailed information relating to the current state of the environment/sustainability and the likely evolution thereof without the implementation of the Strategy. The SEA environmental report should include the relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the Strategy, as is required under Schedule 2 of S.I. 435 of 2004, as amended (this baseline information on the current state of the environment was contained within the Scoping Report, but is not brought forward in sufficient detail in the Environmental Report).	The full baseline information from the Scoping Report has been added to Appendix D of the Environmental Report.

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48	7		The analysis of the existing environmental problems/pressures in the SEA environmental report briefly mentions agricultural pressures on sites of international nature conservation importance (SPAs/SACs) but does not describe these in any detail. This information is addressed in section 3.5.1 of the appropriate assessment and the information should also be reflected in the SEA environmental report to clearly show any potential significant effects on European sites.	Section 3.5.1 of the Natura Impact Statement describes the effects of agriculture on Natura 2000 sites. This has been referred in Section 4.3 of the Environmental Report and added Appendix E of the Environmental Report.
49	7		NON-TECHNICAL SUMMARY Section 3 of the Non-Technical Summary describes the current state of the environment – its strengths, weaknesses, opportunities and threats in respect of the SEA topics. These could be better linked to agriculture, the agri-food industry and recognition of the environmental characteristics of particular areas likely to be significantly affected.	The NTS provides summary of information contained in the SEA Environmental Report and should not contain any new analysis or assessment beyond that in the main report.
50	7	Table 4.1	RELATIONSHIP WITH OTHER PLANS AND PROGRAMMES We welcome the policy context for which the Strategy is being prepared as presented in Table 4.1. of the environmental report. It would be beneficial to include additional information on the plans/programmes with which the Strategy might have potential conflicts, such as the River Basin Management Plan or the National Biodiversity Action Plan, and the measures which would be put in place to address such conflict.	These plans & programmes are considered through Table 4.1 and Appendix B of the Environmental Report and assessed to not conflict with the Strategy. Hence no further action proposed.
51	8		The links with the United Nations Sustainable Development Goals in the Strategy are welcome, however, they should also be referred to in the environmental report. DAFM should also ensure that the Strategy aligns with key relevant high-level plans and programmes including the CAP Strategic Plan and the National Planning Framework – Project Ireland 2040. The Strategy should also be consistent with the relevant objectives and policy commitments of the Climate Action Plan.	SDG goals are referred to in Section 4.4 of the Environmental Report. Schematic included in Strategy to show relationship between CAP and Strategy.

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52	8		Both the SEA environmental report and the Strategy would benefit from the inclusion of a schematic showing the plan hierarchy for agriculture related plans, e.g. CAP Strategic Plan, Agri-Food, AgClimatise, as mentioned in our previous submissions. This would help identify areas which need closer coordination and integration as well as identifying synergies with other relevant Plans	Schematic included in Strategy to show relationship between CAP and Strategy.
Assessment of Alternatives				
53	8	Section 5 and Appendix A	The scoping responses included as Appendix A to the environmental report include a range of proposals for the consideration of alternatives including reducing cattle numbers to 1998-2011 levels and setting environmental targets. The section of the environmental report on the consideration of alternatives should also capture the relevant suggestions regarding alternatives from the scoping responses.	The alternatives considered in the SEA were determined at the scoping stage accounting for the consultations received at that stage. It is not reasonably possible to account for new alternatives at this stage of the process.
54	8	Section 5	The second alternative option presented in the environmental report relates to environmental sustainability. We note that this alternative has been rebranded since the scoping report from “Greater emphasis on environmental sustainability” to now in the environmental report as “Greater emphasis on reduced output”. The aim of considering alternatives is to identify more environmentally friendly and more sustainable ways of achieving the objectives of the plan (which should themselves include sustainability). The rewording of the second alternative presents an already biased option indicating that it is linking environmental sustainability with reduced output for the agri-food sector. It is recommended this alternative is described as it is in the scoping report.	As above.
55	8	Section 5	In addition, the Strategy would have benefited from the inclusion of alternatives around the individual missions or goals such as limiting total nitrogen inputs to the 2011 level and following a path continuing the 1998-2011 trends in nitrogen and cattle numbers, as proposed by An Taisce at the SEA scoping consultation stage.	As above.

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Assessment of Environmental Effects				
56	8		DAFM should assess and document the full range of likely significant environmental effects of implementing the Strategy, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and projects.	Addressed in SEA.
57	8	Table 6.1	Table 6.1 of the environmental report would benefit from the inclusion of a legend to assist with the interpretation of the content of the table. The assessment of environmental effects presented in Table 6.1 should include consideration of the likelihood of an action being implemented or how the implementation of one action may interact with the implementation of another.	Legend added to Table 6.1. Levels of certainty are included in the detailed matrix assessment.
58	8	Section 4.4 and Section 8	Section 4.4 Key Environmental and Sustainability Issues and Likely Future Trends, refers to information gaps for sub-regional information. It also identifies the information gaps relating to specific effects of previous strategies. The monitoring and implementation plan for the Strategy should address these information gaps to ensure availability of this information to inform future strategies and any remedial actions required during implementation. The environmental report should review the environmental monitoring from Foodwise 2025 and how it performs against the SEA objectives.	Strategy updated to take on board this suggestion. RSK referred to ESC Report previously provided.
59	9	Section 6	Despite the well documented impacts of agriculture on European sites, the environmental report does not specifically discuss problems related to agriculture and these sites. The assessment of environmental effects could be better linked with the section 3.5.1 of the Natura Impact Statement for the Strategy on potential impacts on Natura 2000 Sites from agriculture.	Referred to in Section 4.3 and Section 3.5.1 of the Natura Impact Statement added to Appendix E of the Environmental Report.
60	9	Section 6	As a general comment in relation to the conclusions of the assessment of environmental effects, the SEA carried out for Foodwise 2025 identified positive impacts for biodiversity, water and natural capital. However, many of the actual impacts for Foodwise 2025 resulted in a negative impact on the environment. The environmental report for the Strategy concludes again that the impacts of the Strategy will be largely positive. The environmental report should address the negative impacts of Foodwise 2025 and what measures are included in the new Strategy to address this and provide assurances that the actual impacts from the Strategy will be positive as the SEA concludes.	It is respectfully considered that the results of the previous SEA are not of direct relevance to that of the current SEA; no reliance is placed on previous results and the assessments provided in the Environmental Report are independent of any previous findings. The Strategy

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				seeks to address some of the acknowledged issues associated with Food Wise 2025 and it is appropriate for the SEA to assess those measures as proposed now, rather than in the context of the previous strategy. The monitoring measures proposed provide a means of verifying that the impacts forecast in the SEA, positive and negative, are accurate.
Transboundary Effects				
61	9	Section 6.6	It would be useful for section 6.6 Transboundary Effects to make reference to the transboundary consultation carried out at the scoping stage of the SEA and discuss any outcomes and how any information gleaned from the consultation has been incorporated into the environmental report.	Transboundary consultation added to Section 6.6 of the Environmental Report.
Mitigation Measures				
62	9	Section 7	Where DAFM have identified the potential for likely significant effects, appropriate mitigation measures to avoid or minimise these should be provided. DAFM should ensure that the Strategy includes clear commitments to implement the mitigation measures.	Mitigation measures incorporated into the Strategy, unless where a reason is otherwise given as to why they have not been incorporated.

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63	9	Section 7	The environmental report includes mitigation measures which reflect a reasonable approach to improving the effectiveness of the various goals and actions identified. We welcome the inclusion of the cross sectoral mitigation and enhancement proposals. However, it is not clear how, or whether, the measures recommended have been incorporated into the Strategy. The mitigation measures recommended in the environmental report should be included in the Strategy, or an explanation as to why they have not been included should be provided. Likewise, the recommendations from the appropriate assessment should be integrated into the final Strategy. By integrating the recommendations from the respective environmental assessments, the Strategy will reflect the role and importance of the agri-food sector to be managed, and coordinated, in an environmentally sustainable manner.	Mitigation measures incorporated into the Strategy, unless where a reason is otherwise given as to why they have not been incorporated.
Monitoring Measures				
64	9	Section 8	The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities.	Noted.
65	9	Section 8	The Strategy proposes implementation, monitoring and reporting aligned with the environmental monitoring and reporting required under the SEA legislation. This will assist in evaluating the environmental performance of the Strategy.	Noted.
66	9	Section 8	The monitoring measures presented in the environmental report do not clearly relate to the environmental objectives of the Strategy. The monitoring should provide an indication of what remedial measures will be put in place should negative environmental trends be identified. The monitoring programme should ensure that it will monitor the progress in achievement of the Strategy's high-level targets relating to biogenic methane, ammonia emissions, agricultural nutrient losses to water, farmed areas prioritised for biodiversity, increased afforestation, increased marine protected areas, organic farming and food waste reductions.	Monitoring measures included in SEA Statement amended to reflect this recommendation.

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67	10	Table 8.2	Table 8.2, Additional Proposals, refers to monitoring of ammonia deposition at protected sites as an additional measure. Whilst this would be a useful indicator, it would be useful to also include assessment of habitat condition and to look for indicators of ammonia impacts on these habitats (e.g. presence or absence of certain plant species). It is important to directly measure impacts in order to understand the influence of the measured ammonia emissions rather than just the ammonia levels as an indirect indicator. The proposed target to 'Reduce ammonia emissions below 107,500 tonnes by 2030' lacks a focus on environmental outcomes.	Monitoring measures included in SEA Statement amended to reflect this recommendation.
68	10	Section 8	Because of the dominance of the agriculture sector as a source of ammonia, the opportunity to reduce ammonia deposition levels to below specified habitat 'critical loads' should also be considered as a target, in order to specifically protect these sensitive and protected habitats. Assessment of exceedances of habitat specific critical loads of nitrogen should also be employed as a monitoring metric.	Monitoring measures included in SEA Statement amended to reflect this recommendation.
69	10	Section 8	Where the monitoring identifies adverse impacts during the implementation of the Strategy, DAFM should ensure that suitable and effective remedial action is taken. Guidance on SEA-related monitoring is available on the EPA website at https://www.epa.ie/publications/monitoring--assessment/assessment/guidance-on-seastatements-and-monitoring.php	Monitoring measures included in SEA Statement amended to reflect this recommendation.
Future Amendments				
70	10		DAFM should screen any future amendments to the Strategy for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the Strategy. This should apply to amendments to the Strategy on foot of the consultation process and prior to its finalisation.	Final draft of the strategy provided to RSK for review.
71	10		Under the SEA Regulations, DAFM should consult with: <ul style="list-style-type: none"> • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage; • Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media; • Minister for Environment, Climate and Communications; and • Minister for Agriculture, Food and the Marine. 	The environmental authorities have been consulted.

Com Ref.	Page of Letter	ER Report Ref.	Comment	Actions Carried out to Address Comment
72	10		<p>Once the Plan is adopted, DAFM should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Plan; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan; • The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Plan. <p>DAFM should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process</p>	Referred to in the SEA Statement.
73	10		<p>Chapter 13 of the SOER2020 relates to the Environment and Agriculture. The chapter addresses the level of pressure that Irish agriculture has on the environment in terms of greenhouse gases, water quality and biodiversity and highlights the risk posed to Irelands reputation as a food producer as a result. Chapter 2 of the SOER2020 relates to Climate Change. This chapter clearly states the scale and pace of greenhouse gas emissions reductions must accelerate. Reducing emissions requires far-reaching transformative change across the whole economy, including in agriculture. Ireland's greenhouse gas emissions profile – with over one-third of emissions coming from agriculture – is particularly challenging. Ireland must also maximise the use of land as carbon stores, for example through grasslands, wetlands and forestry, to meet targets. These requirements must be balanced in the Strategy with a need to ensure a sustainable food production system. Other chapters in the SOER2020 further address the pressures that agriculture places on the environment including air quality (Chapter 3), land and soil (Chapter 5), nature (Chapter 6), and water (Chapter 7). These chapters should be consulted along with the related Key Messages prior to finalising the Strategy and the SEA process.</p>	Text added to the Strategy to take on board the EPA SOER 2020 findings.

APPENDIX C: SUMMARY OF PUBLIC CONSULTATION SUBMISSIONS ON THE DRAFT AGRI-FOOD STRATEGY 2030

Comment Received:	Response:
Comments and suggested measures relating to overall vision	
<ul style="list-style-type: none"> Generally broad support for the food systems approach adopted in the Strategy 	
<ul style="list-style-type: none"> No major disagreement with the Missions or Goals proposed 	
<ul style="list-style-type: none"> A number of submissions suggested that Irish agriculture should reduce its dependence on livestock and instead, focus on organic / regenerative / agro-ecological approaches with larger horticulture and tillage systems. In addition, there were suggestions that there should be a move away from relying on exports to focus instead on local markets, farmers markets, short supply chains, the domestic market, import substitution 	<ul style="list-style-type: none"> Noted. The Strategy endorses the view that the horticulture and tillage sectors should be increased and also supports an increase in organic farming and more research on regenerative agriculture. The Strategy also contains measures to develop local markets and has highlighted potential for import substitution in sectors such as horticulture. Additional text has been added to Mission 3 Goal 4 to build on the existing text
<ul style="list-style-type: none"> The Executive Summary / introductory chapter would benefit from a schematic showing the hierarchy of agriculture and related environmental plans, and it would be useful to show the relationship between the Agri-Food 2030 Strategy and the Common Agricultural Policy Strategic Plan 	<ul style="list-style-type: none"> A schematic diagram has been added to the executive summary to show the excellent alignment that exists between the CAP objectives and the Missions of this Strategy. A schematic showing the relationship with environmental plans will be considered for inclusion in a context document that will be published separately to the Strategy
Comments and suggested measures relating to Mission 1	
<ul style="list-style-type: none"> The targets are under ambitious and too vague (climate mitigation, biodiversity, water quality referenced the most) 	<ul style="list-style-type: none"> The 2030 Strategy is a medium term framework that guides the economic, environmental and social sustainability of the sector – it is more appropriate that the high level targets are set rather than an extended series of sub-targets. In any event, specific targets have been set to reduce emissions, improve air quality, improve water quality, improve biodiversity, reduce food waste, increase organic farming area
<ul style="list-style-type: none"> The targets are overly ambitious and will impact on farm profitability by increasing costs. Government supports needed to counteract these 	<ul style="list-style-type: none"> A balance has to be struck – some consider the targets overly ambitious while others consider they lack ambition. The targets are a big step in the right direction and set a very clear tone and message

Comment Received:	Response:
extra costs and fund necessary investment on farms such as slurry storage	for all stakeholders in the agri-food sector of the direction it needs to go in over the years to 2030. Without improving environmental metrics, key customers of Irish food and drink could look elsewhere which could impact on the price farmers receive. Many of the practices that will deliver improved environmental metrics don't actually add cost – they are win win in terms of economic and environmental sustainability. Extensive government support is made available through schemes such as TAMS to help farmers with the investments required such as slurry storage
<ul style="list-style-type: none"> Concerns about how environmental targets can be achieved alongside the target to increase exports 	<ul style="list-style-type: none"> In order to increase the value of exports while meeting environmental targets, this clearly has to be on the value side of the equation rather than volume (this is stated in the Strategy) and the key to driving the value element is innovation. It is for this reason that the Strategy has devoted one of its four Missions to this area and has proposed a new approach to innovation which is challenge oriented and output based. There are also proposals for a strategic approach to public R&D funding as well as commitments to increase private sector R&D spend. The export value projection is based on slow, steady, incremental growth in export value between now and 2030. Mission 3 Goals 3 and 4 highlight other actions that tie in with this, such as adding more value to existing output which in turn achieves higher prices in the markets we sell into. It is also about targeting more of the premium markets, those which pay a higher price for the food and drink we produce.
<ul style="list-style-type: none"> Carbon leakage will result from the strategy / is unlikely to be an issue 	<ul style="list-style-type: none"> There are a variety of views on the issue of carbon leakage. The Strategy focuses instead on actions that Irish agri-food can take to reduce its own emissions.
<ul style="list-style-type: none"> Focus should be on emissions per unit of output 	<ul style="list-style-type: none"> While emissions per unit of output are an important metric, it is the total emissions load that is counted in the IPCC inventory and which matters to the environment.
<ul style="list-style-type: none"> Suggestions to consider the Environmental Pillar/SWAN/Stop Climate Chaos 'Towards a New Agricultural and Food Policy for Ireland' paper 	<ul style="list-style-type: none"> This paper has been considered in the revisions to the Strategy and a number of them have been incorporated. A majority of the recommendations in the paper are incorporated into the revised Strategy (to a greater or lesser extent).
<ul style="list-style-type: none"> The Strategy under-plays the significance of the environmental impacts the agri-food sector imposes / Better recognition in the 	<ul style="list-style-type: none"> There are clearly a range of views on this. However, additional text has been added to the revised Strategy to set out the environmental

Comment Received:	Response:
document of how environmentally sustainable Irish agri-food actually is	impacts the sector imposes, including references to the EPA State of the Environment Report.
<ul style="list-style-type: none"> In relation to the national herd size the Strategy must be explicit on the environmental impact of the growing dairy herd and how this will be addressed to ensure a reversal of the negative environmental trends. Break link between animal numbers, fertiliser use and deteriorating water quality; 	<ul style="list-style-type: none"> Action 2 of Goal 1 in Mission 1 aims to produce a plan by end Q2 2022 on the sustainable environmental footprint of the dairy herd, which is in addition to the other multiplicity of Goals and actions in Mission 1 that will also contribute to reducing the environmental impact of the dairy herd; some text changes have also been made to remove the pace of change comment in relation to the herd size and highlight the contributing influence of the rising dairy herd on some environmental indicators in some regions.
<ul style="list-style-type: none"> Regulatory and voluntary measures should be included to reduce methane and nitrous oxide, reverse dairy expansion, cap on nitrogen 	<ul style="list-style-type: none"> The Strategy sets out clear targets and a range of well thought out actions for methane and nitrous oxide reductions, it sets a goal of transitioning to a lower chemical nitrogen use system, and it states the targets build on Ag-Climate which makes clear that any increase in biogenic methane emissions from continually increasing livestock numbers will put the achievement of a climate neutral sector in doubt. The Strategy is only one area for tackling these. Regulatory, private sector and voluntary measures are of course also open to government and other sectoral stakeholders.
<ul style="list-style-type: none"> The Strategy should be consistent with the Climate Action Plan 2019 and the forthcoming Climate Action Plan 2021. In particular, the base year to which the 10% reduction in biogenic methane applies needs to be specified and how this reduction links with the greenhouse gas emissions reduction committed to in the Climate Action Plan 2019. 	<ul style="list-style-type: none"> Base year is now stated; The 2019 Climate Action Plan doesn't set a methane target for agriculture. This 10% target is new. Furthermore, the Strategy acknowledges "the need to adjust this in line with emerging national and international targets for the sector and in line with the development of scientific solutions". New text has been added to the Strategy which states: "The target for biogenic methane will be set in the context of discussions on sectoral targets set out under the Climate Action and Low Carbon Development (Amendment) Bill 2021. The Committee acknowledges that in general, future environmental targets are likely to be set by legislation and commits to participating in the various target-setting processes with a view to the ultimate commitment to be climate neutral by 2050)".
<ul style="list-style-type: none"> Pathways and timelines to achieving targets need to be clearer; 	<ul style="list-style-type: none"> The pathways for achieving the targets are the actions. 61 actions across 7 Goals in Mission 1. Many more initiatives, policies, programmes and schemes will follow on from these – prescriptive

Comment Received:	Response:
	<p>detail can't be provided on these at this stage. Timelines will be in the implementation plan which will be published separately.</p>
<ul style="list-style-type: none"> • Further measures to prevent habitat loss or destruction needed; Require environmental assessments to prevent habitat destruction; Need more clear actions to prevent biodiversity loss and enhance restoration, especially nature conservation and designated sites, natural habitats and species, conservation of legally protected species • Measures needed to reduce impact of modification to habitats and organic soils on water; Current enforcement regime around hedgerow removal and waste burning should be strengthened. • Ambitious programs needed to recover wildlife habitats 	<ul style="list-style-type: none"> • Mission 1 Goal 2 Action 8 states “Ensure that farms and forests do not contribute to habitat destruction and isolation, and also protect features of cultural heritage and traditional landscapes. This should include better enforcement of existing environmental rules, including strengthened implementation of the Environmental Impact Assessment (EIA) Agricultural Regulations in order to avoid habitat removal and loss of carbon pools”. Additional text has been added from the AA mitigation recommendations. Further, it should be noted that under the new CAP, new conditionality and Eco-scheme will aim to preserve existing habitats. Regarding consent to remove hedgerows, thresholds already exist for hedgerow removal under the EIA Agricultural Regulations. Consent is required once certain criteria is not met under those Regs.
<ul style="list-style-type: none"> • Update Ag-Climate to reflect further commitments to reduce GHGs as per new climate budgets 	<ul style="list-style-type: none"> • It has always been stated that Ag-Climate is a living document and action 3 of Goal 1 in Mission 1 commits to updating Ag Climate, as required, to ensure consistency with new targets agreed nationally and internationally for the agri-food sector.
<ul style="list-style-type: none"> • The ambition to increase afforestation should specify a value that the agri-food sector could aim to achieve. Similarly, in relation to doubling the production of biomass, there is no definitive figure. Afforestation with native trees, no clear fell. Have specific target for agro-forestry 	<ul style="list-style-type: none"> • Targets have now been included. More emphasis on agro-forestry has been included. Much of the detail on forestry will be developed in the new Forestry Strategy (action 1 of Goal 4 Mission 1).
<ul style="list-style-type: none"> • Questions around the real extent of global warming and in any event, using the wrong metric to measure methane 	<ul style="list-style-type: none"> • Action 5 of Goal 1 Mission 1 addresses the point on methane: “Ireland will play a leading role in shaping how greenhouse gas emissions from livestock farming are understood and addressed. As research progresses on the different characteristics of various GHGs, especially short-lived emissions such as methane, these need to be recognised and reflected by the United Nations Framework Convention on Climate Change and the Intergovernmental Panel on Climate Change”.
<ul style="list-style-type: none"> • Animal health should be leveraged more for climate mitigation 	<ul style="list-style-type: none"> • Reference added in Mission 1.
<ul style="list-style-type: none"> • Too much emphasis is placed on technological solutions which will not be enough to address the loss of biodiversity or damage to water quality. 	<ul style="list-style-type: none"> • The Strategy outlines 15 actions to restore and enhance biodiversity and improve water quality, some of which are technological solutions but others are not.

Comment Received:	Response:
<ul style="list-style-type: none"> There should be more focus on composting and anaerobic digestion / anaerobic digestion has limited potential 	<ul style="list-style-type: none"> There are a range of views on the potential of anaerobic digestion. Some amendments have been made to action 7 Goal 1 Mission 1.
<ul style="list-style-type: none"> Direct payments should be linked to land use activities that focus on co-benefits and ecosystem services; Results based agri-environmental schemes; Mainstream pilot results-based programs - co-create systems with farmers; Carry out biodiversity studies, and increased targeted agri-environment schemes; Results-based, High Nature Value farming initiatives need to be mainstreamed across all land-use types. Payment supports for ecosystem services rather than carbon farming 	<ul style="list-style-type: none"> Text added to Exec Summary which highlights direction of new CAP, especially eco-schemes and conditionality; action 2 in Goal 2 of Mission 1 states “ Put in place more targeted agri-environmental schemes under the next Rural Development Programme (RDP) to protect and enhance Ireland’s habitats and species. These schemes should include results-based actions, including payments for delivery of specific measures”; the strategy promotes the concept of co-creating initiatives with farmers – see Goal 3 of Mission 4.
<ul style="list-style-type: none"> More research into regenerative agriculture. 	<ul style="list-style-type: none"> See action 6 Goal 1 Mission 1.
<ul style="list-style-type: none"> Food Waste Hierarchy recommends feeding people with this food as a circular economy solution over bioenergy, animal feed, or compost. Impact of reducing food waste and adopting zero waste approaches is underestimated. 	<ul style="list-style-type: none"> Text amendment to action 6 Goal 6 Mission 1.
<ul style="list-style-type: none"> Major EU policies such as Farm to Fork, Biodiversity need more impact analysis / the strategy doesn’t reflect adequately the measures in Farm to Fork and EU Biodiversity Strategy 	<ul style="list-style-type: none"> There are a range of views on these EU Strategies. They are considered in the Strategy and have influenced its contents. However, it also has to be recognised that detailed discussions on their implementation remain ongoing and the Strategy has highlighted the need for impact assessments.
<ul style="list-style-type: none"> The significant number of fisheries being harvested above Maximum Sustainable Yields should be addressed / sustainable Total Allowable Catches(TACs) need to be set in line with the Common Fisheries Policy (CFP) legal obligations 	<ul style="list-style-type: none"> Goal 5 of Mission 1, to enhance the environmental sustainability of the seafood sector, contains ten actions, several of which address these very issues.
<ul style="list-style-type: none"> Origin Green: - should be discontinued / metrics should be improved to include more environmental criteria / more clarity needed on how data sharing and improved metrics will happen 	<ul style="list-style-type: none"> Origin Green is well established and recognized both at home and abroad as the world’s only national food and drink sustainability programme. It serves a dual function in terms of driving sustainability improvements on Irish farms and food businesses, while providing evidence of this to customers of Irish food and drink in domestic and international markets. The Programme has been independently accredited. It is operated by Bord Bia, who recently came first in a ranking of the most reputable companies and organizations in the State. Notwithstanding, there is a recognition that it needs to improve and this is why an entire Goal has been dedicated to Strengthening and investing in Origin Green and other sustainability supports to

Comment Received:	Response:
	reflect the higher level of ambition for the agri-food sector (Mission 1, Goal 7). In addition, text changes have been made to action 3 in this Goal to address the point on metrics.
<ul style="list-style-type: none"> The title of the Mission 1, Goal 3 should be changed to include the restoration of all waterbodies impacted by agriculture and classified as at risk from agriculture by the EPA 	<ul style="list-style-type: none"> Title changed in re-draft.
Comments and suggested measures relating to Mission 2	
<ul style="list-style-type: none"> Strategy can't make more farmers unviable - priority must be to increase incomes 	<ul style="list-style-type: none"> The 2030 Strategy has brought farmers centre stage in the ten-year Strategy and has put much more emphasis on their economic and social viability than predecessor strategies. A structured series of goals and actions which are realistic and practical for improving the economic viability and well-being of farmers is laid out. Farm incomes will be part of the monitoring and reporting will take place on them as key performance indicators. There is a high ambition for primary producers in mission 2, focusing on the premiumisation of output, increased integration of certain sectors, and diversification of activity and income streams. There is an ambition for a more equitable distribution of value along the value chain, with recognition that higher environmental sustainability has a cost, which cannot be fully borne by the primary producer. The question of who pays, and appropriate prices for food, is an important one and it is a debate that needs to be started.
<ul style="list-style-type: none"> Growth should be value not volume 	<ul style="list-style-type: none"> The target for export growth is explicit in stating it is value, not volume.
<ul style="list-style-type: none"> More support needed for tillage and horticulture sectors which are more environmentally friendly and should form a new more diversified agriculture sector. Horticulture deserves more than one action 	<ul style="list-style-type: none"> The Strategy supports the intention to grow these sectors. While there may only be 1 action for horticulture, it has a good level of detail which sets out five key areas to be addressed in a new dedicated horticulture strategy. Other new text has been added too in order to bolster this important sector, and it has also now been highlighted in Goal 3 of Mission 2.
<ul style="list-style-type: none"> A policy that has tillage farmers producing food grade products rather than animal feed and straw 	<ul style="list-style-type: none"> The actions for the tillage sector actually make specific reference to the significant contribution it can make to the food and drinks sectors in the form of malting barley, milling wheat and oats for the breakfast cereals industry.

Comment Received:	Response:
<ul style="list-style-type: none"> Emphasise potential of forestry as an additional income stream for farmers 	<ul style="list-style-type: none"> This is already highlighted in the Strategy, but new text has also been added to this section in goal 1 of mission 2.
<ul style="list-style-type: none"> Increase organic target to 25%, clearer targets and supports for horticulture; reference the EU Organic Action Plan; emphasise its role in reaching climate neutral sector by 2050 	<ul style="list-style-type: none"> Promotion of organic farming is referenced frequently in the draft Strategy, with an ambition to reach 7.5% of the UAA in organic farming by 2030. The 25% target would be extraordinarily ambitious in an Irish context and it could lead to the loss of any market bonus for organic produce; new text added to address other points here in the actions relating to organic farming in Goal 3 of Mission 2.
<ul style="list-style-type: none"> Support local food initiatives 	<ul style="list-style-type: none"> There are five actions on domestic and local markets in Goal 4 of Mission 3 and new text has been added to build on these, particularly around local and community initiatives.
<ul style="list-style-type: none"> Establish national GI framework and Centre of Excellence for Geographical Indicators (GIs). Enhance Marketing and Promotion of PDO/PGI 	<ul style="list-style-type: none"> Action 6 of Goal 2 addresses this.
<ul style="list-style-type: none"> Need to improve gender balance 	<ul style="list-style-type: none"> Gender is included in the Strategy at various points. At primary producer level, actions 8-11 in Goal 4 are aimed at this and have been added to (especially on the point of capturing data).
<ul style="list-style-type: none"> Siloing the topic of generational renewal as solely a social element rather than recognising that all aspects of sustainability are impacted by the current low numbers of young farmers present in the industry. 	<ul style="list-style-type: none"> Generational renewal is a cross-cutting area in the Strategy. The main focus on generational renewal is in Mission 2, improving social sustainability of primary producers. The Committee is agreed that young farmers have an important role to play in driving environmental improvements and adopting new technologies and innovation, but equally all farmers have to participate, not just young farmers. Additional text has been added to the generational renewal section in Goal 4 of Mission 2.
<ul style="list-style-type: none"> Not all farmers should be in a quality assurance scheme as this removes distinction/value of participation. 	<ul style="list-style-type: none"> The text on this (action 4 Goal 2 Mission 2) has been amended.
<ul style="list-style-type: none"> Develop, fund and implement a Just Transition action plan for the agricultural sector to identify and address the specific needs of farmers and communities in rural areas. Assess the emissions reductions and environmental benefit of diversification options 	<ul style="list-style-type: none"> A new action has been added to Goal 3 Mission 2 to address this.

Comment Received:	Response:
Comments and suggested measures relating to Mission 3	
<ul style="list-style-type: none"> Definitions on sustainability and health as they relate to diets are unclear 	<ul style="list-style-type: none"> New text added to the 'Food, Nutrition and Health' section of the Introduction chapter.
<ul style="list-style-type: none"> Welcome action to improve policy coherence and Dept. Health/DAFM committee and this should include public health nutrition expertise 	<ul style="list-style-type: none"> This action states "These various initiatives should be advanced through effective citizen engagement and informed by scientific evidence and expert advice and input from stakeholders representing all aspects of the food and health systems".
<ul style="list-style-type: none"> Labelling cannot be biased against meat and dairy / varying views expressed about Nutri-Score 	<ul style="list-style-type: none"> Amendment to the text to say the labelling initiatives should be evidence-based.
<ul style="list-style-type: none"> Restriction of marketing and promotion of foods which have both large carbon footprints and negative health impacts 	<ul style="list-style-type: none"> The Strategy already contains a number of actions in this area, such as action 2 in Goal 1 which aims to make healthy and sustainable food choices available to consumers as easily as possible.
<ul style="list-style-type: none"> Voluntary re-formulation likely to be ineffective 	<ul style="list-style-type: none"> Research has shown significant reductions in sodium from reformulation, with lesser reductions in sugar and saturated fat
<ul style="list-style-type: none"> Move away from industrial farming, stop pursuing exports and focus instead on shorter supply chains, local markets, farmers markets, urban gardening and urban farming, domestic market, import substitution 	<ul style="list-style-type: none"> While short supply chains certainly have merit and an important role in the global food system, it must also be remembered that this is a complex and diverse system. OECD research in the aftermath of COVID has shown that short supply chains are in fact more susceptible to shocks and that participating in global value chains is a more robust and resilient approach. In any event, additional text has been added to the existing 5 actions on local and domestic markets in Goal 4 to address some of these points.
<ul style="list-style-type: none"> Over use of animal based agriculture, there is clear consumer move towards plant based diets 	<ul style="list-style-type: none"> The Strategy actually acknowledges dietary changes, including increasing demand for plant based diets in some countries.
Comments and suggested measures relating to Mission 4	
<ul style="list-style-type: none"> Research needed to prove health benefits of functional foods / naive to pursue functional food research. 	<ul style="list-style-type: none"> There are a range of views here. In a document such as this we cannot cover the complexity of the regulatory environment. The Strategy actions in this area are not in any case proposing functional ingredients as the end game for nutrition.
<ul style="list-style-type: none"> Integrate data sources in ag-tech. 	<ul style="list-style-type: none"> The actions contained in Goal 4 of Mission 4 on enhancing the use of technology and data are considered to go some way to addressing this point.

Comment Received:	Response:
<ul style="list-style-type: none"> More public-private research collaboration building on recent examples such as Vistamilk 	<ul style="list-style-type: none"> It is considered, Goals 1 and 2 of Mission 4 address this while it is also called out in Goal 1 of Mission 1.
<ul style="list-style-type: none"> Ensure efforts for global leadership extend beyond high level events such as the UN Food Systems Summit. 	<ul style="list-style-type: none"> Text added to Goal 7 to address this.
<ul style="list-style-type: none"> Increase the quantity and focus of development cooperation flows for agricultural research, extension and education in low-income countries. 	<ul style="list-style-type: none"> Text added to Goal 7 on research element.
<ul style="list-style-type: none"> Include a reference to Ireland's climate diplomacy, linking food diplomacy to climate diplomacy. 	<ul style="list-style-type: none"> Text added to Goal 7 to address this.
<ul style="list-style-type: none"> Strengthen the 'food system approach' credentials of the Strategy by: Broadening the stakeholder base for the strategy; Seek to be explicit about potential synergies and trade-offs in the strategy. 	<ul style="list-style-type: none"> The 2030 Stakeholder Committee was large, had broad representation, particularly of the stakeholders most directly involved in the sector and likely to have to implement the actions contained in the Strategy. Notwithstanding this, a special section on 'working in partnership' was included in the monitoring and implementation framework which will broaden engagement with other groups – additional text has been added to the dialogue and partnership section (actions 7-9). In addition, the consultation exercises conducted during development of the Strategy meant that all stakeholders could have their say and this was typified in the running of a series of Food System dialogues in 2021 during the public consultation; it is correct to say there are synergies and trade-offs in food systems – these will be elaborated on in other fora in the run up to the UN Food Systems Summit in 2021 and beyond.
<ul style="list-style-type: none"> Promote and support women's return to work programmes; collect and publish gender disaggregated data on take up of all schemes/measures/participation; promote and report on women in leadership roles in the agri-food sector 	<ul style="list-style-type: none"> Women's return to work programme is highlighted in action 4c, Goal 6; additional text added to gender sections in goal 6 of Mission 4 and Goal 4 of Mission 2 to address other gender balance points.
<ul style="list-style-type: none"> Innovation not only about pursuing lowest cost. Needs to account for generating value along the supply chain. More R&D. 	<ul style="list-style-type: none"> Goal 2 in Mission 2 aims to improve the creation and equitable distribution of value in the supply chain and Goal 2 of Mission 4 aims to increase R&D.
<ul style="list-style-type: none"> Concerns around protections for agri-food workers; promoting decent work and conditions of employment 	<ul style="list-style-type: none"> Amendments made to action 2 Goal 6 of Mission 4 as well as additional text to the COVID section in the Introduction chapter.

Comment Received:	Response:
Comments and suggested measures relating to Monitoring and Implementation	
<ul style="list-style-type: none"> • Include clear mechanisms for accountability and enforcement of targets 	<ul style="list-style-type: none"> • Extensive additional text has been added to sections III and IV of the Monitoring and Implementation Framework to address these comments.
<ul style="list-style-type: none"> • In relation to monitoring the environmental performance of the Strategy, outcome-focused and activity-based metrics are required 	
<ul style="list-style-type: none"> • Develop appropriate agri-food metrics that measures beyond production – nourishment, biodiversity, healthy habitats 	
<ul style="list-style-type: none"> • The Strategy Implementation Plan should clearly set out the actions, targets, timeframes and the appropriate body or bodies responsible for implementation of the actions supporting the objectives/commitments in the Strategy 	
<ul style="list-style-type: none"> • Address lack of robust monitoring mechanisms in previous strategies 	
<ul style="list-style-type: none"> • A separate environmental monitoring group should be established, which includes independent scientists and academic experts. 	
<ul style="list-style-type: none"> • Include provisions for annual reporting and thresholds for when remedial action needed 	
<ul style="list-style-type: none"> • Metrics to go beyond the normal measures of agricultural productivity 	
<ul style="list-style-type: none"> • It would be useful for the implementation plan to refer to monitoring and implementation from Foodwise 2025, (e.g. learnings and information gaps) to address how this information can be applied to improve the new Strategy 	
Other comments	
<ul style="list-style-type: none"> • Under representation of environmental groups and civil society on the committee • Over representation of ‘agri-food industry’ on committee 	<ul style="list-style-type: none"> • Comments noted; the Stakeholder Committee was large, had broad representation, particularly of the stakeholders most directly involved in the sector and most likely to have to implement the actions contained in the Strategy; there was also more consultation on this Strategy than had ever taken place previously.

Comment Received:	Response:
<ul style="list-style-type: none"> Challenges in the engagement between Agriculture and Environmental Stakeholders / more emphasis needed on communication and collaboration 	<ul style="list-style-type: none"> Noted, this is why there is a dedicated section in the monitoring and implementation framework for 'acting in partnership', including actions around dialogue and communications.
<ul style="list-style-type: none"> Strategy should be withdrawn and re-formulated to account for carbon budgets and new CAP 	<ul style="list-style-type: none"> Noted, but the Strategy has been cognisant of the main changes to the new CAP, and new text has been added to show how they both align, with very good alignment between the 9 CAP objectives and the 4 Missions of the Strategy. In relation to the carbon budgets, Mission 1 actually states "The target for biogenic methane will be set in the context of discussions on sectoral targets set out under the Climate Action and Low Carbon Development (Amendment) Bill 2021. The Committee acknowledges that in general, future environmental targets are likely to be set by legislation and commits to participating in the various target-setting processes with a view to the ultimate commitment to be climate neutral by 2050".
<ul style="list-style-type: none"> Re-draft the Strategy and adopt Environmental Pillar's points in their document submission 	<ul style="list-style-type: none"> Careful consideration was given to the Environmental Pillar/SWAN/Stop Climate Chaos paper (Towards a New Agricultural and Food Policy for Ireland Recommendations for Government) and a majority of its recommendations are contained in the Strategy; it must also be recognised that the process for developing the Strategy is participative and requires compromise from all sides.