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Re: Draft interventions for the CAP Strategic Plan

Dear Sir/Madam

The Environmental Protection Agency (EPA) welcomes the opportunity to input into the current phase of consultation on the development of the Common Agricultural Policy (CAP) Strategic Plan. We note that this consultation provides an early opportunity to provide feedback on the outline composition of the proposed interventions, and that the Department intends to have a follow up consultation later in the year on the whole draft plan. This submission should be read in conjunction with our submission on the [Strategic Environmental Assessment scoping for the plan, dated 13th April 2021](#).

The EPA has focussed its attention in this submission on the environmental interventions. Without the specifics of what is being proposed it is difficult to provide detailed comment at this stage, but there are however a number of important principles that should be considered as the environmental interventions are being designed.

As outlined in the EPA's recent State of the Environment Report, there is unequivocal evidence that agriculture in Ireland is causing pollution and damage to ecosystems and biodiversity. The sector is responsible for approximately a third of national greenhouse gas emissions, over 99 per cent of national ammonia emissions and is the largest significant pressure on our water resources. Economic growth in the agri-food sector in recent years is happening at the expense of the environment, as evidenced by trends in water quality, air emissions and biodiversity all going in the wrong direction. Business-as-usual scenarios will not reverse these trends.

It is clear from our published assessments of agriculture that change is now required in the sector to ensure – and ‘assure’ – its environmental sustainability. New measures must go beyond improving efficiencies and focus on reducing total emissions of all pollutants and to all receptors. Measures are also needed to address new EU strategies including the Farm to Fork Strategy and the recently published “Fit for ‘55 package”, which sets ambitious but sustainable targets to ‘transform the EU’s food system’. Systemic change is required across the sector to address the challenges and as such it is important that the objectives of the CAP strategic plan, and the interventions set out within it, aim to drive such change and monitor its progress.

We welcome the change in emphasis in this CAP to that of a performance, results-based approach to implementation, and would support this principle being embedded throughout the design of all the environmental interventions. It is also recommended that outcome targets for the interventions are set, and ongoing monitoring programmes are established to track progress towards those targets. This will help to demonstrate and track the sector’s environmental credentials in an evidenced based way.

It is clear through the EU Green Deal and associated strategies that there is an expectation that the CAP conditionality should aim to increase the overall level of environmental ambition in the agricultural sector. We note that under ‘conditionality’, Member States are obliged to set the minimum standards that must be complied with by those in receipt of payments, through the Statutory Management Requirements (SMRs) and standards for Good Agricultural and Environmental Condition (GAECs). Consideration should be given to carrying out an assessment of whether, and how effective the current SMRs and GAECs are, as a means of providing a basic level of protection for the Irish environment, and whether there is opportunity to further strengthen them to address Ireland’s environmental issues.

The Ecoscheme represents a significant opportunity to engage a large number of the farmers who are in receipt of payments in environmental actions. It will be important that the options are designed to be both attractive for the farmer and environmentally effective, within the overall framework of the green architecture and the objective to increase the environmental ambition. We note the list of options that are currently under consideration. The Department may also wish to consider nature-based catchment management solutions which have benefits for natural flood mitigation, and measures to support the circular economy.

We welcome the commitment that the national agri-environment climate measure (AECM) will recognise the principle of the “*right measure in the right place*” and that it will be targeted based on the needs in particular locations. While certain issues such as climate are considered national issues, the spatial element of addressing other issues such as water quality or biodiversity is fundamental for achieving environmental outcomes. The AECM and the ecoscheme interventions should look to introduce environmental measures that will have multiple environmental benefits that deliver for the environment as a whole rather than a single component.

Further consideration and clarity is needed on how the three elements of the new green architecture (conditionality, ecoschemes and agri-environmental schemes) are going to interact and complement each other to provide coherent environmental outcomes, consistent with the principle of ‘the right measure in the right place’.

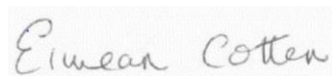
Consideration should be given to assessing whether further guidance, support or conditions should be associated with the Areas of Natural Constraint (ANC) payments. As noted, these areas are often lands where there is high nature value, and it would be helpful to determine whether the environmental outcomes on these lands are being optimised to their full potential. There is evidence for example, that land reclamation and drainage in some of these areas is compromising the health of aquatic ecosystems in what were previously high-status catchments.

The EPA welcomes the proposed changes to the definitions of agricultural area and eligible area, noting that this is estimated to make approximately 55,000 additional hectares of land that includes features that may be beneficial to water protection, climate or biodiversity, now eligible for payments.

One of the key findings of the EPA State of the Environment Report 2020 was that there are many interlinkages and dependencies between environmental policies and legislation, and that these links need to be better connected and reinforced. The CAP consultation document notes that achieving policy coherence is an important objective in the CAP strategic plan but notes that this is challenging because of the breadth of those interlinkages across the agricultural sector. The interventions provide the State with considerable opportunity to coordinate how major environmental challenges, such as addressing climate change mitigation and the decline in nature, and improving water quality in our catchments, are addressed in the Irish landscape in an integrated way. We would therefore encourage ongoing cross-Departmental and cross-Agency collaboration to design the specifics of all the environmental interventions with this objective in mind.

We look forward to continuing our engagement with the Department as the Cap Strategic Plan is further developed.

Yours sincerely

A handwritten signature in cursive script, reading "Eimear Cotter".

Dr Eimear Cotter

Director, EPA's Office of Evidence & Assessment