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21<sup>st</sup> December 2021



**Re. Draft Common Agricultural Policy Strategic Plan 2023-2027 and SEA Environmental Report**

Dear Sir/Madam,

We acknowledge your notice, dated 8<sup>th</sup> November 2021, in relation to the Draft CAP Strategic Plan 2023-2027 (the CSP) and the associated SEA Environmental Report. The observations in this submission should be taken as supplementary to those in previous communications from the EPA relating to the Draft CAP Interventions (31<sup>st</sup> August 2021), and comments on the SEA scoping report (13<sup>th</sup> April 2021) and the submission on the SWOT analysis (October 2019).

The EPA is a statutory environmental authority under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.

This submission comprises four parts, *viz*, a cover letter addressing high-level review observations, and three detailed Appendices: Appendix I providing specific comments on the SEA Environmental Report and overall SEA process; Appendix II providing specific comments on the CSP; and Appendix III referencing chapters in the recent EPA State of Ireland's Environment Report 2020 as considered relevant to the CSP.

The EPA recognises the importance of the agriculture sector to the rural economy. However, the evidence is irrefutable that the sector is putting significant pressure on the environment in Ireland and is causing pollution and damage to our atmosphere, surface waters, ecosystems and biodiversity. The EPA's [Ireland's Environment - An Integrated Assessment](#) (SOER2020) addresses the significance of the impact agriculture is having on the Irish environment and highlights the



need for a more holistic farm management and water catchment-level management approach, encompassing all environmental pressures, to ensure progress towards a more environmentally-sustainable and carbon-neutral food production system.

## **Overview**

The CSP is central to driving the systemic change needed in the agriculture sector. It provides a significant, and critical, opportunity to deliver the required environmental outcomes, while at the same time delivering on the environmental, economic and social objectives as set out in FoodVision2030. It is essential that there is consistency and alignment between the CSP and the environmental objectives in other national and international plans/programmes and government policy.

## **Key Messages of this Submission**

### **1. Water Quality**

Agriculture is the most widespread significant pressure impacting on our rivers, lakes, estuaries, coastal waters and groundwaters. Excess nutrients reaching our waterways is the most significant issue. Approximately 1000 waterbodies that are impacted by agriculture are at risk of not meeting their water quality objectives and trends are going in the wrong direction. Urgent and targeted action is required to reduce the amount of nutrients entering our waters. We acknowledge the inclusion in the SEA Environmental Report of the objective 'to maximise the protection and enhancement' for water. This objective should also include reference to the 'restoration' of our waters.

The EPA supports implementing a '*whole of farm approach*' that places and integrates the farm and farming enterprise in the context of its environment setting and within the overall river basin catchment setting. It permits setting farm specific management targets that will deliver for the farm business, the local environment, the catchment as a whole, and national environmental objectives (*right measure, right place*).

In this regard, the cornerstone of the SEA Environmental Report (ER) is the principle of the right measure in the right place (overarching mitigation measure 1) which is welcome. However, it is not clear how this has been integrated into the CSP. The CSP needs to provide clarity on how schemes will be provided to foster farmers' behavioural choices based on the location and risk-profile of their farms. There must be clarity on how these schemes will be implemented on the ground to deliver the required environmental outcomes, given the largely voluntary nature of the measures proposed. Without this spatial level of targeting measures, the State's investment in measures will deliver limited environmental outcomes.

### **2. Integration of SEA into the CAP Strategic Plan**

The CSP should include clear commitments to implement the recommendations and mitigation measures identified in the SEA Environmental Report. The integration of the SEA Environmental Report and the CSP will allow for cross-checking thereby reinforcing and maximising the potential for positive environmental outcomes.



A high level of integration is also particularly important given that the CSP is one of the key national plans which will either advance or hinder the achievement of Ireland's environmental national commitments and obligations, including those relating to protecting and improving water quality and biodiversity, and meeting our climate change commitments.

In order to ensure the effectiveness of the environmental assessment the integration of the SEA must be completed prior to submitting the CSP to the Commission for approval.

### **3. Monitoring Programme**

The CSP does not explicitly include formal targets and only proposes a minimalist monitoring programme. This places meeting of the aims of the CSP and the SEA - in terms of environmental sustainability - at a significant risk of not being achieved.

A strong, reliable and independent evidence base is needed to demonstrate and communicate the effectiveness of the CSP. A comprehensive monitoring programme will be essential to ensure that the implementation of the CSP does not have a negative impact on the environment in Ireland. The monitoring programme should be outcome focussed and include a robust system to track (including KPIs) and monitor the performance of the CSP along with other key agricultural related plans such as FoodVision 2030, AgClimatise and the forthcoming 5<sup>th</sup> Nitrates Action Programme. The monitoring for the CSP should be aligned with the monitoring required under the SEA legislation.

The CSP should adopt an adaptive management strategy for monitoring, i.e. what measures will be put in place if a proposed target is not achieved. The publication of an interim monitoring review would allow the monitoring programme to be modified to allow for any future changes to the various environmental targets. Robust monitoring of the implementation of the interventions, and the environmental outcomes they are expected to achieve, will be an important asset in establishing the sustainability credentials of the sector.

### **4. Compliance**

The agriculture sector is a vital cog in the rural economy. It is clear that farmers need to be supported and incentivised to carry out land management activities in an environmentally sustainable manner, while also providing for economically viable livelihoods. The CSP however also needs to recognise that achievement of the aims of the CSP may require enforcement measures or penalties for poor environmental performance.

It is clear from the recent Nitrates Action Programme Consultation document, and the interim report for the Agricultural Sustainability Support and Advice Programme, that the current levels of non-compliance with the existing minimum statutory and best practice standards, under *Conditionality*, is unacceptable and must be addressed. The full suite of compliance tools should be utilised, including support and advice, incentives, and a strengthened enforcement and inspection regime. Achieving compliance with the minimum standards of the CAP should be a central tenet and precondition that underpins any interaction the sector has with the State or the State's financial resources.

In relation to policy coherence across other relevant plans and programmes, DAFM should ensure that the CSP aligns with relevant national-level plans and programmes and is consistent with the relevant objectives and policy commitments therein. The CSP must explicitly incorporate measures which will contribute to the achievement of the recently published Climate Action Plan 2021 and associated targets for the agricultural sector.

## **5. Transboundary Consultation**

The SEA ER should provide clarity regarding the level of transboundary consultation that has been undertaken in preparing the CSP and associated SEA. Where transboundary consultation has been undertaken with non-EU member states, the relevant requirements of the SEA protocol<sup>1</sup> under the ESPOO Convention should be taken into account and referred to.

If you have any queries or need further information in relation to this submission, please contact [REDACTED] Office of Evidence and Assessment, directly. I would be grateful if you could send an email confirming receipt of this submission to: [sea@epa.ie](mailto:sea@epa.ie)

Yours sincerely,

[REDACTED]

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[REDACTED]  
Director

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<sup>1</sup> <https://unece.org/fileadmin/DAM/env/eia/documents/legaltexts/protocolenglish.pdf>



## **APPENDIX I – SPECIFIC COMMENTS ON THE SEA ENVIRONMENTAL REPORT AND THE SEA PROCESS**

### Introductory Comments

The SEA Environment Report (ER) provides a very good overview of the environmental baseline taken into account in assessing the CAP Strategic Plan (the CSP). The SEA clearly shows how the input from the consultations at SEA scoping stage has been incorporated into the Strategic Environmental Objectives, prepared for the SEA Environmental Report.

It is important that the recommendations of the SEA are fully considered in the CSP. This is particularly important given that the CSP is one of the key national plans which will either advance or hinder the achievement of Ireland's environmental national commitments and obligations, including those relating to protecting and improving water quality and biodiversity, and meeting our climate change commitments. The assessment process - including the resultant mitigation measures identified - should inform the CSP commitments regarding environmental protection.

### Ch.3 Methodology

We acknowledge the inclusion of Table 3:1 *Summary of SEA scoping submissions and SEA response to same*, which outlines how submissions received have been addressed in the ER.

The reference in Section 3.12 Data Gaps and Uncertainties of the SEA ER to the EPA landuse mapping tool should be amended to refer to the OSI National LandCover mapping programme to be completed in 2022.

### Ch.4 Relationships with other plans and programmes

Table 4:1 identifies key international plans and programmes of relevance to the Plan. Regarding recent climate change commitments, we recommend that the relevant commitments from the recent COP26 in Glasgow should also be referred to.

The discussion on the European Green Deal in Section 4.2 should acknowledge the requirements of the *Fit for 55* package.

Additionally, references within the ER to the Climate Action Plan should refer to the Climate Action Plan 2021 (published 4<sup>th</sup> November 2021) rather than previous iterations. The Climate Action Plan 2021 specifically includes sectoral targets for reducing Ireland's agricultural emissions by 22-30% by 2030 and should be reflected throughout both the SEA ER and the draft CSP, where appropriate.

### Ch.6. Strategic Environmental Objectives

We acknowledge the amendments made to the Strategic Environmental Objectives (SEOs) subsequent to the comments received during the scoping consultation period.



It would be useful to consider how these environmental objectives align with other national level plan objectives to ensure an integrated and coordinated approach to achieving our national environmental commitments and obligations.

We acknowledge the inclusion of the objective for water "*to maximise the protection and enhancement...*". The objective should also include reference to *restoring all waters*, as this is a key element of the Water Framework Directive.

#### Ch 5 & Ch. 8 Assessment of environmental effects

In general, the baseline data is well presented, with an emphasis on agriculture and focus on most relevant significant issues of relevance to the CSP.

In Section 5.4 (Climatic Factors and Air Quality) there is merit in clarifying which greenhouse gas emissions projections have been considered, given that both 2019 and 2020 emissions projections are referred to in the text.

The text would also benefit from describing separately the relevant climatic factors/greenhouse gas emissions and air pollution/air quality aspects. In addition, Climatic Factors and Air Quality on page 75 discusses different projections scenarios in the context of the wider economy, rather than focussing specifically on the agriculture sector. Where possible, the agriculture related contributions and projections over the relevant time period should be described.

The emission reduction targets from the EU Effort Sharing Regulation are referenced on page 79. The text should be revised to refer to the correct regulation as the Effort Sharing Decision<sup>2</sup> and its associated targets.

We welcome that the SEA incorporates a series of environmental sensitivity maps (Figures 5.29-5.30). Where these maps are outputs from the Environmental Sensitivity Mapping Webtool they should be referenced as such.

For Section 5.5.3 entitled Landuse and Landcover, the text appears to mostly relate to landcover. We recommend that the section include a definition for both land use and land cover to describe the distinction between them.

Table 8.1 sets out an assessment of *Conditionality* through the Good Environmental and Environmental Condition (GAECs). GAEC 2 relating to the protection of wetland and peatland is welcomed. The SEA ER refers to 420,000ha of cultivated peatlands. This figure should be reviewed against the figures in The Climate Action Plan 2021.

It is also worth noting that the Climate Action Plan 2021 includes a reference to a proposed National Land Use Review. This should be acknowledged regarding future land use and associated land use management. The EPA is leading on the evidential piece of this review and currently has an open call for expert evidence in relation to the National Land Use Review<sup>3</sup>.

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<sup>2</sup> [Effort sharing 2021-2030: targets and flexibilities \(europa.eu\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021R0871)

<sup>3</sup> <https://www.epa.ie/our-services/monitoring--assessment/assessment/land/>



## Ch.7 Alternatives

The ER presents a comprehensive discussion on alternatives and we acknowledge the different alternatives considered and the methodology involved in their assessment and selection of the preferred alternative for the CSP.

Section 7.5 *Preferred Alternative Conclusion* lists out some key measures that are required, including improved *Conditionality*, tailored responses for habitats and emissions reductions. Aspects such as soils and landscape should also be considered in any 'tailored responses for habitats such as peats and grasslands'. Similar to the manner in which "*GHG emissions and enteric methane reductions*" have been included as a measure, water should also be included as a key measure as agriculture is the biggest nutrient contributor to declining water quality.

## Ch. 9 Mitigation Measures

We note the proposed mitigation measures to avoid or minimise the potential for likely significant effects associated with the CSP. We recommend that clear commitments are provided in the CSP to implement or integrate these mitigation measures and recommendations. We also recommend including a section showing how the findings of the SEA have been integrated into the CSP.

## Ch. 10 Monitoring

The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should address 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, responsibilities and reporting arrangements.

We acknowledge that the monitoring tables provide monitoring indicators, such as investments in biodiversity and datasets. The monitoring programme would benefit from additional text clarifying how the impacts/outputs are to be measured.

The inclusion of more quantifiable indicators, where possible, would also be of benefit to show real change, be that positive or negative, such as thresholds for corrective action, should be considered. Linking the monitoring programme to the relevant remedial measures and the thresholds which would trigger such measures, would also significantly contribute to the effectiveness of the monitoring programme.

We note the extensive list of suggested monitoring indicators in Table 10:1 *SEA Monitoring Table* of the SEA ER. The table states under the heading "*Atmospheric concentrations of key agricultural pollutants*" that there should be a reduction of ammonia emissions to below 107,500t by 2030. Including references to specific absolute values for this target, should be reconsidered as the target is based on a percentage reduction on calculated 2005 ammonia emissions. The percentage reduction for 2030 is a 5% reduction on 2005 ammonia emission levels.

We note that three of the four monitoring indicators selected for the SEA Significant Issue; '*Reduce ammonia emissions year on year under the National Emissions Ceiling Directive*' are related to water-based monitoring. DAFM should also consider utilising, as appropriate, more air-



based monitoring indicators e.g. results from ammonia monitoring as part of the European Monitoring and Evaluation Programme (EMEP) and the National Ecosystems Monitoring Network (NEMN).

The EPA *Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring* is available at: <https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php>. Additionally, the EPA guidance on *'Assessment of impact of ammonia and nitrogen on Natura sites on intensive agriculture installations'*<sup>4</sup> should be considered when finalising the monitoring programme.

#### Future Amendments to the CSP

Where any amendments to the CSP are proposed, these should be subject to SEA and AA screening for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the CSP. This should apply to amendments to the CSP prior to publication of the final CSP.

In addition, we note that DAFM circulated updates to the Eco-schemes, in the interim since the beginning of the public consultation on the SEA ER and the draft CSP. These changes to the draft CSP should be considered in the SEA and the Appropriate Assessment prior to the adoption of the final CSP.

#### SEA Statement – "Information on the Decision"

Once the CSP is adopted, you should prepare an SEA Statement that summarises:

- How environmental considerations have been integrated into the CSP;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the CSP;
- The reasons for choosing the CSP 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 CSP.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

Guidance on preparing SEA Statements is available on the EPA website at the following link: <https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php>

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<sup>4</sup> <https://www.epa.ie/publications/licensing-permitting/industrial/ied/assessment-of-impact-of-ammonia--nitrogen-on-natura-sites-on-intensive-agriculture-installations.php>



## Consultation with Environmental Authorities

Under the SEA Regulations, you should consult with:

- Environmental Protection Agency;
- Minister for Housing, Local Government and Heritage;
- Minister for Environment, Climate and Communications; and,
- Minister for Agriculture, Food and the Marine.

The SEA ER should provide clarity regarding the level of transboundary consultation that has been undertaken in preparing the CSP and associated SEA. Where transboundary consultation has been undertaken with non-EU member states, the relevant requirements of the SEA protocol<sup>5</sup> under the ESPOO Convention should be taken into account and referred to.

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<sup>5</sup> UNECE Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessment in a Transboundary Context.

## **APPENDIX II: – SPECIFIC COMMENTS ON THE DRAFT CAP STRATEGIC PLAN 2021-2027**

### General Comments

The CSP places an emphasis on the EU's three general objectives for rural areas:

- A. smart/competitive/resilient/diversified;
- B. environmental protection; and,
- C. strengthened socio-economic fabric.

Overall, the CSP is largely a voluntary plan from an environmental perspective, where all measures are opt-in, with the exception of *Conditionality* which is currently poorly defined. There are no legal requirements to partake in the environmental measures.

The CSP does not explicitly include formal targets and only proposes a minimalist monitoring programme. This places meeting of the aims of the CSP and the SEA - in terms of environmental sustainability - at a significant risk of not being achieved: further highlighting the need for greater integration between the SEA and the CSP.

There is merit in considering extending the scope of the Agricultural Sustainability Support and Advice Programme (ASSAP) to include a role in encouraging more of the small scale farmers into the additional schemes, providing clarity on the benefits of the schemes to both the farmers (economically and sustainably) and the environment.

### Integration of the findings from the SEA ER into the CSP

The mitigation measures and recommendations from the SEA ER should be incorporated into the CSP. The CSP would benefit from the inclusion of a subsection or chapter related to "Environmental Assessment" showing how the assessment process and the SEA recommendations have been integrated into the CSP. In particular, the CSP should include clear commitments to implement the recommended mitigation measures identified in the SEA.

Similarly, the CSP should consider an additional table related to how the findings and recommendations of the Appropriate Assessment have been reflected in the final plan.

### Compliance with existing legislation

The agriculture sector is a vital cog in the rural economy. It is clear that farmers need to be supported and incentivised to carry out land management activities in an environmentally sustainable manner, while also providing for economically viable livelihoods. The CSP however also needs to recognise that achievement of the aims of the CSP may require enforcement measures or penalties for poor environmental performance.

It is clear from the recent Nitrates Action Programme Consultation document, and the interim report on the ASSAP, that the current levels of non-compliance with the existing minimum statutory and best practice standards - under *Conditionality* - is unacceptable and must be addressed. The full suite of compliance tools should be utilised, including support and advice, incentives, and a strengthened enforcement and inspection regime. Achieving compliance with



minimum standards should be a central tenet and precondition that underpins any interaction the sector has with the State or the State's financial resources.

The CSP would benefit from the addition of a comprehensive summary of the detail of the State's expectations of the GAECs<sup>6</sup> and SMRs<sup>7</sup> making it clear to farmers and other stakeholders what the basic minimum standards are on farm. The provision of this information in a clear, specific and coherent manner will facilitate better compliance in the sector.

### 'Right measure in the right place'

While the SEA ER extensively recommends the implementation of the right measure in the right place, there is little evidence of this recommendation being implemented through the CSP. While climate measures for example may accrue benefits, and are counted at the national scale, a more targeted approach is required for water quality and biodiversity.

Where other plans or programmes are responsible for establishing or supporting achievement of the right measure in the right place, this should also be recognised and supported within the CSP. In particular, this may relate to protection of biodiversity (e.g. National Biodiversity Action Plan and All Ireland Pollinator Plan) and water quality (e.g. River Basin Management Plan).

It is important that measures to reduce nitrogen leaching are implemented in the specific catchments where there are known nitrogen concerns, and on the freely draining soils that are high risk for nitrogen loss. Similarly, it is important, for example, that specific actions to protect designated habitats and protected species, such as hen harriers, are implemented in the relevant areas in an appropriate manner. Without this spatial level of targeting measures, the State's investment in measures will deliver limited environmental outcomes.

We note the indication that within the Eco-schemes specific actions may be targeted at a specific cohort of farmers. The CSP could clarify how this will be achieved and how the targeting will be focussed on achieving the required environmental outcomes in specific areas. We welcome the recent increase in the number of Eco-scheme options available to farmers. We would welcome if opportunities to further expand and develop these on a wider scale could be achieved over the lifetime of the CSP.

The EPA supports implementing a '*whole of farm approach*' that places, and integrates, the farm and farming enterprise in the context of its environment setting and within the overall river basin catchment setting. It permits setting farm-specific management targets that will deliver for the farm business, the local environment, the catchment as a whole, and national environmental objectives.

The EPA welcomes the commitment that the national Agri-Environment and Climate Measure (AECM) will be targeted through community cooperation projects, designed to achieve environmental improvements at landscape and river catchment levels. We welcome the results-based approach to implementing agri-environment schemes under Pillar II and would also

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<sup>6</sup> Good agricultural and environmental conditions - abbreviated as GAEC, refers to a set of European Union (EU) standards (described in Annex II of [Council Regulation No 1306/2013](#) defined at national or regional level), aiming to achieve a sustainable agriculture.

<sup>7</sup> Statutory Management Requirements



welcome this principle being embedded throughout the design of all the environmental interventions.

### Water Quality

The evidence shows that agriculture is the most significant pressure impacting on our waters. Approximately 1000 waterbodies that are impacted by agriculture are at risk of not meeting their water quality objectives and trends are going in the wrong direction. The most prevalent issues are phosphorus and sediment runoff, and nitrogen leaching. These issues are specific to different parts of the country and different soil types, and interventions must therefore be spatially targeted to address them. It is critical that the ecoschemes and the agri-environment and climate measures take this into account. This spatial targeting principle should also be considered under *conditionality*, i.e. in the requirements for Good Agricultural Environmental Condition (GAECs) and the Statutory Management Requirements (SMRs). The State is already investing in an assessment of what specific actions are needed on-farm to improve water quality through the Local Authority Waters Programme and the ASSAP. The CSP should support the delivery of those required actions.

### Air Quality

A key message in relation to air quality for the CSP is that tried and tested methods in relation reducing ammonia emissions should be an upfront requirement for farmers, e.g. housing technologies (e.g. ventilated manure belts), storage covers, etc. These types of measures should be prioritised applied when considering managing nitrogen losses from farm practises. These measures should be seen as complementary to other measures albeit acknowledging that other interventions could generate greater emission reductions.

The CSP recognises that planting trees for ammonia mitigation should be used as a complimentary measure for reducing on-farm emission of ammonia to atmosphere. However, it should be noted that it takes time for young trees to mature to the point where the canopy closes and the maximum ammonia capture is reached. Therefore, it is important to recognise the importance and relevance of the tried and tested methods in terms of reducing agricultural ammonia emissions in the interim until any planted trees provide their maximum benefit.

Consideration should be given to including all Natura 2000 sites under Tier I: currently only Natura 2000 sites in private ownership, low input grassland, commonage land, geese and swan areas and EPA-designated priority areas for action are included. Natura 2000 sites where critical load/levels are exceeded would especially benefit from inclusion. This would address local issues relating to ammonia and their negative impact on habitats.

One of the objectives of the co-operation option, under the Agri Environment Measure under Article 71, which is provided to farmers in defined high priority geographical areas is "*To adapt farm plans at a local level to meet EU and national priorities, as outlined above, as well as the Nitrates Directive, the Birds Directive, the Priority Action Framework, the Green Deal and the Farm to Fork and Biodiversity Strategies and Ireland's Ag-Climate.*". This objective would benefit from including references to the Habitats Directive and Water Framework Directive.

There is merit in also including a measure related to the production of biomethane, to contribute to renewable energy targets, e.g. anaerobic digestion networks.



## Climate

Ireland's greenhouse gas emissions profile – with over one-third of emissions coming from agriculture – is particularly challenging. The CSP must explicitly incorporate measures which will contribute to the achievement of the recently published Climate Action Plan 2021 and associated targets for the agricultural sector.

Since 2011, GHG emissions from agriculture have trended upwards with an overall peak in emissions reported in 2018. In the last 10 years, dairy cow numbers have increased by 46 per cent with a corresponding milk production increase of 60.3 per cent. Projections for the agriculture sector in the absence of any abatement measures suggest that greenhouse gas emissions will continue to grow steadily, mainly because of continued increases in the size of the dairy herd.

Agriculture is also responsible for over 99% of national ammonia (NH<sub>3</sub>) emissions (an important air pollutant) and is currently in breach of the targets set out in the National Emissions Ceilings Directive. As we move forward the targets for 2030 will be unreachable without significant take up of abatement measures at farm level.

Damage to the environment from agriculture activity undermines the credibility of Ireland's clean, green image on which the Food Wise 2025 and Agri-Food strategy 2030 is constructed.

Ireland cannot achieve its climate and air pollutant ambitions without the agricultural sector delivering its contribution. The Department of Agriculture, Food and the Marine's roadmap 'AgClimatise', which is a national climate and air roadmap to 2030, and measures included in the National Air Pollution Control Programme and the Climate Action Plan 2021 are critically important in this regard. These targets and measures should be incorporated into the CSP.

## Alignment with other plans and programmes

DAFM should ensure that the CSP aligns with the other relevant national-level plans and programmes and is consistent with the relevant objectives and policy commitments therein. The objectives of the CSP should align with the relevant commitments of the Climate Action Plan 2021. Additionally, the CSP must be consistent with the National Planning Framework (most notably National Policy Objectives 21, 23 and 25<sup>8</sup>), FoodVision 2030, the River Basin Management Plan, the National Hazardous Waste Management Plan, the National Action Plan for Antibiotic resistance, the National Plan for Antiparasitic resistance, the National Air Pollution Control Programme and the forthcoming 5<sup>th</sup> Nitrates Action Programme. The various national DAFM and Teagasc roadmaps (e.g. AgClimatise, Teagasc Dairy Roadmap, etc.,) for the sector must also be aligned.

On an international scale, DAFM should ensure that the CSP aligns with the relevant EU policies and strategies, including the Biodiversity Strategy to 2030, the Farm to Fork Strategy and the Green Deal. Relevant requirements of the newly published EU Soils Strategy should also be integrated into the CSP. For example, where farmers are farming on peaty soils, the soils should

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<sup>8</sup> National Policy Objective 21 relates to supporting innovation in rural economies through the diversification of the rural economy into new sectors and services, including those addressing climate change and sustainability. National Policy Objective 23 relates to the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector including diversification into on-farm and off-farm activities. National Policy Objective 25 relates to DAFM investment in rural Ireland.



be protected for the services they provide in relation to ecosystem services and carbon sequestration, and farmers could be compensated more for those services.

### Monitoring

While Chapter 7 of the CSP relates to monitoring, it does not provide information on how the monitoring measures will be implemented. For example, the monitoring should support and seek to address the relevant measures included in the Climate Action Plan 2021, in particular the target for the agriculture sector of reducing emissions by 22-30% by 2030. Any new agreements relating to greenhouse gases from the COP26 should also be incorporated into the monitoring programme.

The CSP should adopt an adaptive management strategy for monitoring, i.e. what measures will be put in place if a proposed target is not achieved. The publication of an interim monitoring review would allow the monitoring programme to be modified to allow for any future changes to the various environmental targets.

A comprehensive monitoring programme of the spatial locations and types of interventions that are implemented should be established, so that the actions can be linked to environmental outcomes. This will help to provide the evidence-base to demonstrate the environmental credentials of the plan, for the sector, and for future plans. Therefore, we suggest that the monitoring programme should be outcome focused. Accordingly, the articulation of impact-based metrics is required to allow for tracking of the sector's overall performance and accountability in protecting the environment and achieving the various elements of the CSP.

The CSP should set out provisions for environmental monitoring and related reporting in implementing over its lifetime. Environmental outcome targets should be set to track progress towards achievement of the relevant environmental targets. This will help learnings to improve further schemes and will provide the sector with the evidence base to demonstrate its sustainability credentials.

### Implementation and Governance

Successful implementation of this CSP will depend on significant intra-departmental (between department divisions), inter-agency and cross departmental coordination and cooperation. This should be clearly recognised in the CSP.

We recommend the preparation and publication of a CSP Implementation Plan alongside the CSP itself that sets out a clear pathway for achieving its the implementation and tracking of the CSP in achieving its high-level objectives. Such an Implementation Plan should clearly set out the actions, targets (e.g. Climate Action Plan 2021 agricultural sector target, Water Framework Directive targets, etc.), timeframes and the appropriate body or bodies that will be responsible for implementation of the actions supporting the objectives/commitments in the CSP. This will significantly strengthen the CSP and reduce the risk of poor implementation. The Implementation Plan should also link into the SEA-related monitoring obligations required under the SEA legislation for the CSP.

It will be important that implementation reports are published annually or at least biennially to provide insight into the effectiveness of the implementation of the CSP. This would enable the environmental performance of the CSP to be evaluated and further action taken during the life



of the plan where the desired environmental outcomes are not being achieved. This would also provide for increased transparency during implementation.

To support the delivery of both the CSP and the recommended Implementation Plan, we recommend that DAFM establish a High-Level CAP Implementation Group, supported by the different government departments and organisations involved in the preparation of the CSP. This could perhaps be a continuation of the work of the CSP Consultative Committee. The arrangements in place for the implementation of Food Wise 2025 (FW2025) and the Offshore Renewable Energy Development Plan (OREDPA) provide examples of existing successful approaches. For FW2025, a High-Level Implementation Committee overseeing the implementation of the actions is chaired at ministerial level. An Environmental Sustainability Committee addresses the actions dealing specifically with sustainability reporting to the High-Level Implementation Committee. A similar model could also be applied for implementation of the CSP.

We welcome the proposed establishment of an Implementation and Environmental Monitoring Working Group and the Evaluation Team in 2022. These will be crucial to ensuring a successful monitoring programme is undertaken and would appropriately fit as a sub-group under a High-Level Implementation group discussed above.



### **APPENDIX III: KEY CHAPTERS OF IRELANDS ENVIRONMENT – AN INTEGRATED ASSESSMENT 2020**

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, ammonia<sup>9</sup>, 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.

Chapter 7 relates to water and identifies agriculture as the most significant pressure on our waters. The chapter focuses on the stark and dramatic reduction in pristine waters from 500 in 1990 to 20 in 2020. It calls for tighter measures to be covered in the next River Basin Management Plan and the Nitrates Action Programme to mitigate the impacts from fertiliser spreading, slurry spreading and other nutrient losses.

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) and nature (Chapter 6).

These chapters should be consulted along with the related Key Messages prior to finalising the CSP and the SEA process.

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<sup>9</sup>also highlights impact of non methane volatile organic carbon (NMVOC) and nitrogen oxides