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Our Ref: SCP200802.2

Re. Draft Agri-Food Strategy 2030 and SEA Environmental Report

Dear Mr Wyse,

We acknowledge your notice, dated 30th April 2021, in relation to the draft *Agri-Food to 2030* strategy (the 'Strategy') and its associated SEA Environmental Report. We welcome the opportunity to contribute at this stage of the preparation of the new Strategy.

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

This submission is comprised of four parts, *viz*, a cover letter addressing high-level review observations, and three detailed Appendices: with Appendix I providing specific comments on the Agri-Food strategy; Appendix II providing specific comments on the SEA Environmental Report and overall SEA-process; and Appendix III referencing chapters in the recent EPA [State of Irelands Environment Report 2020](#) as considered relevant to the Strategy.

Introductory Comment

The observations in this submission should be taken as supplementary to those in previous communications from the EPA relating to the strategic priorities for the new strategy (July 2020), comments on the SEA scoping report (September 2020) and comments on the draft chapter "*A Climate Smart, Environmentally Sustainable Agri-Food Sector*" (February 2021).

As an overarching comment, the evidence shows that *Foodwise 2025's* guiding principle to embed 'environmental protection and economic competitiveness as equal and complementary' was not

successful: in recent years greenhouse gas and ammonia emissions have been increasing, and water quality and biodiversity declining, while at the same time the agricultural production has been increasing.

The EPA reiterates the headline issues that we highlighted in our letter to the DAFM in February 2021 with comments on the draft executive summary and the draft environment chapter, namely:

- 1) Environmental challenges are being underplayed, and,
- 2) The level of ambition presented is low.

We welcome that the published draft Strategy has incorporated many of our observations. However, it is our view, that the Strategy needs further strengthening in terms of communicating the message of the significance and urgency of the scale of environmental challenge that we face as a nation and indeed the role of agriculture therein. For example, the first reference to the negative trends in environmental impacts, attributable to agriculture in Ireland, is on page **47** of the draft report. The Strategy needs to acknowledge up front the role that agriculture has played in contributing to these negative environmental trends as a way of highlighting the scale of the challenge ahead.

Alignment with Plans & Programmes

The Department of Agriculture, Food and the Marine (DAFM) should ensure that the Strategy aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments. The Strategy should be consistent with the Climate Action Plan 2019 and forthcoming Climate Action Plan 2021. EPA analysis indicates that the proposed target for a 10% reduction in methane does not meet even the lower level of greenhouse gas emission reductions committed to in the Climate Action Plan 2019. This needs to be addressed. In addition, the Strategy must be consistent with the National Planning Framework (in particular National Policy Objectives 21, 22 and 25¹), the River Basin Management Plan and the Regional Spatial and Economic Strategies. Although still in preparation, the new Strategy should clearly show how it will be aligned with the Common Agricultural Policy Strategic Plan 2023-2027 and its guiding European legislation.

Strategy Ambition

It is critical that the 2030 Strategy must match its level of ambition with tangible and challenging environmental emissions reduction targets (refer detail in Appendix 1) and should set out a clear pathway with timelines to show how these targets will be achieved. The Strategy must embrace new measures that go beyond improving efficiencies and focus on reducing total emissions by breaking the link between animal numbers, fertiliser use and deteriorating water quality.

The current model of subsidies or payments to farmers does not adequately support the addressing of environmental issues. It may be appropriate that direct payments be linked to land use/ land management activities that focus on co-benefits and ecosystem services, and that encourages increased ambition. This would protect farm incomes, provide environmental protection and also foster appropriate land uses.

¹ 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 22 relates to tourism development including the Peatlands Strategy. National Policy Objective 25 relates to DAFM investment in rural Ireland.

Implementation and Monitoring

In relation to monitoring the environmental performance of the Strategy, outcome-focused and activity-based metrics are required to allow for tracking of the sector's overall performance and accountability in improving sustainability and protecting the environment.

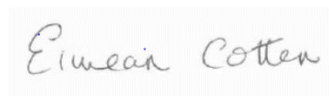
The monitoring should include measures to address new EU policy including the Farm to Fork Strategy, which sets ambitious but sustainable targets to '*transform the EU's food system*'. The *Agri-Food to 2030* Strategy must ensure Ireland has an agriculture and food sector that demonstrates validated performance around producing food in an environmentally sustainable way and acknowledge that transformative change will be required to deliver this.

State of the Environment Report – Ireland's Environment 2020 (SOER2020)²

In finalising the Plan and integrating the findings of the SEA into the Plan, the recommendations, key issues and challenges described in our SOER2020 should be considered, as relevant and appropriate. This should also be taken into account, in preparing the Strategy and associated SEA. Appendix III sets out the chapters which are particularly relevant to the development of the Strategy.

If you have any queries or need further information in relation to this submission, please contact Suzanne Wylde, 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.

Yours Sincerely,



Dr Eimear Cotter

Director

Office of Evidence and Assessment

² <https://www.epa.ie/our-services/monitoring--assessment/assessment/irelands-environment/state-of-environment-report/>

APPENDIX I – SPECIFIC COMMENTS ON THE DRAFT AGRI-FOOD 2030 STRATEGY

GENERAL COMMENTS

The plan would benefit from the inclusion of a table of contents to assist in navigating the document.

In general, the document should include more detailed consideration of forestry related aspects. This should consider the restrictions experienced by the sector at present. The role of forestry in carbon sequestration and biodiversity enhancement warrant mention. In addition, the potential for negative effects on water quality, if forestry is not managed properly, should be highlighted along with relevant mitigation measures.

EXECUTIVE SUMMARY

The executive summary document would benefit from the inclusion of discussion on the following (some of which are referred to in the main document):

- Reducing the impacts of pesticide use in agriculture – This should be linked to the requirement in the EU Biodiversity Strategy for 2030 which includes specific measures for reducing the use of chemical pesticides in Agriculture (50% reduction by 2030);
- MCPA contamination of drinking water supplies;
- Reference to anti-microbials, anti-parasitics and genetically modified organisms should be included as these all have relevance, particularly for the aquaculture sector;
- Issues around land spreading of sludge and biosolids.

The Executive Summary, as well as the introductory chapter of the Strategy, would benefit from a schematic showing the hierarchy of agriculture and related environmental plans, European and national. It would be useful to show the relationship between the Agri-Food 2030 Strategy and the Common Agricultural Policy Strategic Plan and how they will work together towards achieving the targets specified in the Strategy. A schematic like this will show coherence between European and national plans and explain the policy context within which the Strategy is set.

The Strategy needs to acknowledge the role that agriculture has played in contributing to the negative trends in environmental impacts, attributable to agriculture, and should do so both in the executive summary and in the Introduction and Context.

MISSIONS, GOALS AND ACTIONS

Mission 1: Goal 1: Develop a climate neutral agri-food system so that by 2050, the climate impact of methane is reduced to zero and remaining agricultural emissions are balanced by removals; and improve air quality.

There is reference throughout the document to an absolute target value for ammonia. The NEC Directive for 2030 does not set absolute value targets. The targets are a percentage reduction on 2005 levels which, in the case of ammonia is a 5% reduction on 2005 emission levels.

As mentioned earlier, it is essential, that the Strategy is 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. The EPA estimates that methane needs to be reduced 13-16% to be consistent with the lower level of ambition in the Climate Action Plan 2019 of 16.5 Mt greenhouse gas emission reductions. This is based on the EPAs ongoing work on the 2021 projections. Therefore, the committed reduction in

biogenic methane emissions in the Strategy does not meet the lower level committed to in the Climate Action Plan 2019.

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. The discussion around stable herd size hides the fact that the absolute increase in dairy cow numbers is having significant impact on the environment. The comment that "*the pace of increase has slowed*", does not address the fact that the dairy herd continues to grow.

In order to ensure the Strategy can deliver on addressing the associated environmental impacts such as playing a leading role in shaping how greenhouse gas emissions from livestock are understood and addressed, there needs to be a definitive approach and plan for direct and sustained engagement with farmers.

Mission 1 refers to an ambition to increase afforestation but does not 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. In order to ensure that the impacts of the Strategy and the success of the Strategy can be measured, specific values for both of these should be included.

Mission 1: Goal 2: Restore and enhance biodiversity

We suggest considering factors related to the biomass and therefore, carbon stock of hedgerows be taken into account as part of hedgerow assessment for the baseline biodiversity studies. This will provide additional benefit in terms of quantifying the potential of hedgerows for carbon storage and sequestration.

The Agency understands that DAFM is investing significant resources into the use of remote sensing to assess land use/land cover and land management. This should be included in action 3 related to land use review. Significant resources are also being invested in land cover/ land use mapping by other organisations including the EPA. It is important that these valuable datasets are highlighted as being available to provide the necessary background to the land use review discussions.

The Teagasc GHG MACC and the Climate Action Plan 2019 highlight the proposed rewetting of or reduced management intensity of 40 kha of grasslands on organic soils. The message should be stated, under action 8, to highlight the benefits of rewetting or reduced management intensity of grasslands on organic soils.

The EPA submission in February 2020 (Mission 1, Goal 2, Action 7), referred to the low level of ambition to ensure that farms and forests do not contribute to habitat destruction and isolation. The current draft Strategy does not include further measures to address our concern. There is scope for the Strategy to require a form of environmental assessment, and/or achievement of environmental targets, for agriculture related activities. The assessments could be linked to funding or permitting systems. For example, to assist with achieving targets it may be appropriate that direct payments be linked to land use / land management activities that focus on co-benefits and ecosystem services, in areas where intensive agriculture is not viable. This would protect farm incomes, provide for environmental protection and also foster appropriate land uses. Such an assessment, or targets, would go beyond those that currently legally require environmental impact assessment for agriculture related activities. The detail of these assessments could be developed in the early stages of implementation of the Strategy in consultation with the agri-food sector.

DAFM have announced, under the Basic Payment Scheme, that water quality features/actions be eligible for inclusion in the scheme. Previously only lands within Priority Areas for Action in the River Basin Management Plan were eligible for inclusion. All areas of the country are not included. This should be extended country-wide under action 9 on protecting biodiversity.

Mission 1: 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.

The key impacts of farming on water quality are:

- Runoff of phosphorus and sediment from poorly draining soils into watercourses;
- Leaching of excess nitrogen through freely draining soils to groundwater and then to water courses;
- Chemicals such as pesticides and herbicides reaching watercourses and drinking water sources;
- Modifications to the physical aquatic habitat conditions in water courses, including sediment erosion, arising through land drainage, dredging of water courses and channelisation

In high status waters, which are often in upland areas, the key issues are the physical habitat modifications and sediment runoff from forestry and agriculture. These areas are also often underlain by organic soils. Farming on organic soils can pose a risk to water quality through losses of nutrients from fertilisers, and through discharges of ammonium when these soils are drained. There are, however, no measures included in the Strategy to address the problems arising from modifications to the physical habitat, or measures specific to the management of organic soils, both of which are particularly important in the catchments of high-status waters.

The Strategy includes measures to address nutrients and MCPA for drinking waters which are welcome. However, notwithstanding that, it would be beneficial if the wording of the MCPA action could be strengthened to bring a more proactive focus to the issue.

Mission 1: Goal 7: Strengthen and invest in Origin Green and other sustainability supports to reflect the higher level of ambition for the agri-food sector.

The ability of the sector to validate its performance is extremely important. It is key that the data is shared with key stakeholders. The action relating to metrics and evidence needs to be clear on how the collaboration between the relevant stakeholders will happen, who will drive the data sharing and how this will be made accessible and user friendly for the agri-food sector.

MONITORING AND IMPLEMENTATION FRAMEWORK

We welcome the inclusion of the chapter in the Strategy relating to monitoring and implementation. We note the reference to the establishment of a High-Level Implementation Committee (HLIC) to oversee the implementation of the Strategy and the proposed publication of an Agri-Food Strategy Implementation Plan alongside the Strategy. 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. This will set a clear pathway for the implementation and tracking of the Strategy in achieving its Missions and Goals.

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. This will significantly strengthen the Strategy and reduce the risk of poor implementation. Given the broad range of stakeholders involved in implementation, it will be important that those bodies be consulted about the preparation of the Implementation

Plan. There is merit in considering the establishment also of individual focussed sector-specific sub-groups to oversee the Strategy and review progress on implementation of relevant sector measures.

The *Dialogue and Partnership* implementation section refers to engaging with children and students. The proposed working group should consider using existing mechanisms to engage with children and students including Green Schools, Macra na Feirme and Gaisce.

The Implementation Plan should include provisions for annual reporting on implementation of the Strategy commitments. It should also include links with the SEA-related monitoring obligations required under the SEA legislation. Thresholds should be agreed for the relevant topics to determine when remedial action would be required to be introduced.

The *Environmental Monitoring, Review and Reporting* should consider including actions to monitor the relevant aspects of the European Green Deal and the EU Biodiversity Strategy for 2030.

APPENDIX II – SPECIFIC COMMENTS ON THE SEA ENVIRONMENTAL REPORT AND OVERALL SEA PROCESS

GENERAL COMMENTS

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.

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 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.

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.

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.

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.

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, Ag-Climatise, 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.

ASSESSMENT OF ALTERNATIVES

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 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.

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.

ASSESSMENT OF ENVIRONMENTAL EFFECTS

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. 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.

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.

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.

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.

TRANSBOUNDARY EFFECTS

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.

MITIGATION MEASURES

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.

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.

MONITORING

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.

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.

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.

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.

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.

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-sea-statements-and-monitoring.php>

FUTURE AMENDMENTS TO THE PLAN

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.

ENVIRONMENTAL AUTHORITIES

Under the SEA Regulations, DAFM should consult with:

- 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.

SEA STATEMENT – "INFORMATION ON THE DECISION"

Once the Plan is adopted, DAFM should prepare an SEA Statement that summarises:

- 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.

DAFM should send a copy of the SEA Statement with the above information 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/monitoring--assessment/assessment/guidance-on-sea-statements-and-monitoring.php>

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, 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.