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17 April 2023

EPAC Reference No: 0523

**Re: Department of Agriculture, Food and the Marine – Statement of Strategy 2023-2026**

Dear Mr McMahon,

We acknowledge your correspondence dated 16<sup>th</sup> February 2023 in relation to the preparation of the Statement of Strategy 2023-2026.

The Environmental Protection Agency (EPA) recognises the importance of agriculture, fisheries and forestry to both the Irish environment and rural & national sustainable development and welcomes the opportunity to submit our views on your new Statement of Strategy for the period 2023-2026, specifically in relation to key strategic issues and cross-cutting issues for the period. In this context, the EPA has made submissions to DAFM relating to various plans and programmes (see Appendix 1). This letter builds on those submissions, further emphasising a need for, action on climate change, ammonia emissions, improved water quality, compliance and other considerations.

The EPA publishes a State of the Environment Report every four years, the most recent of which was published in 2020 ([Ireland's Environment - An Integrated Assessment](#)). With regard to agriculture, the EPA stated that "**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, emissions and biodiversity all going in the wrong direction. Business-as-usual scenarios will not reverse these trends. New measures must go beyond improving efficiencies and focus on reducing total emissions by breaking the link between animal numbers, fertiliser use and deteriorating water quality**". In this context, the development of this new Strategy offers the opportunity to address key environmental issues namely greenhouse gas emissions, ammonia emissions, water quality and biodiversity that are of relevance to sectors

within DAFM's remit and to define metrics that will track progress towards the mitigation of these issues.

### Greenhouse Gases

Ireland's Greenhouse Gas Emissions Projections 2021-2040 published by the EPA in May 2022 highlighted that under the Existing Measures scenario agricultural emissions are projected to increase by 1.9% over the 2020-2030 period. A methane emissions reduction of almost 30% is required to achieve a 22% reduction in Agriculture emissions compared to 2018, as committed to in the 2021 Climate Action Plan (further updated to 25% in the 2023 Plan). The EPA has highlighted that sector must clearly set out how this will be achieved to address uncertainty regarding its ability to deliver even the lower end of the range of its sectoral targets within the ever-shortening timeframe to 2030. In this context, the Statement of Strategy should explicitly address the importance of implementing the Climate Action Plan, clarify the uncertainty regarding the sector's ability to deliver the reductions committed to and should define metrics focussed on tracking achievement of the associated sectoral targets within DAFM's remit.

### Ammonia

The National Emissions Reduction Commitments Directive (2016/2284/EU) sets national emission reduction commitments for Member States for five important air pollutants including ammonia. As you are aware, the Agricultural sector accounts for 99% of Ireland's ammonia emissions. The EPA's assessment of Ireland's air pollutant emissions for 2020 found that Ireland did not comply with its emission reduction commitments for ammonia for 2020 being emissions being 3.1% greater than 2005 baseline rather than reducing as required under the Directive. This non-compliance is as a direct result of increased agricultural activity highlighting the need for action to reduce agricultural emissions of ammonia. The strategy should commit to focussed action to achieve compliance with Ireland's Emissions Reduction Commitments and should commit to providing a metric for tracking progress towards compliance with the ammonia ceiling.

### Water Quality

The recent EPA Water Quality in Ireland 2016-2021 report states that 46% of Ireland's surface waters are in moderate, poor or bad ecological status. The evidence states that the three most significant pressures on water quality in Ireland are agriculture (impacting over 1,000 water bodies), hydromorphological impacts (453 water bodies impacted) and forestry (232 water bodies impacted). The number of water bodies impacted by agriculture increased since the previous report and this is unacceptable. The Statement of Strategy should commit to ensuring that the number of water bodies impacted by agriculture and forestry activities will be reduced over the period of the strategy. In this context metrics on the number of water bodies negatively impacted by Agricultural activities should be considered under the Strategy. I note that discussions on same and metrics related to the Nitrates are underway with our Office of Environmental Assessment.

### Compliance

It is important that the Statement of Strategy includes a specific commitment to protecting Ireland's environment. It should include a greater emphasis on compliance, implementation and enforcement of legalisation relating to all aspects of our environment. The EPA has seen an increasing number of food and drink sector facilities on the EPA's National Priority Site list with six

of the thirteen sites on the List in 2022 from this sector. Emphasis on the need to ensure compliance as a minimum should form part of the DAFM strategy to maintain and enhance Ireland's green image. In this context, compliance with environmental requirements should be a metric under the Statement of Strategy to ensure no food and drink facilities are included on the EPA's National Priority Sites list in the future.

#### Peatlands

The continued use of peat and peat-based growing systems within Ireland's horticulture sector urgently needs to be addressed as a key priority for the sector. EPA is not aware of any peat extraction operations in Ireland that have planning permission and an EPA licence and there are no applications currently with the EPA. The EPA is aware that illegal extraction has been taking place and is taking several prosecutions against multiple operators for the illegal extraction of peat. If the horticulture sector is to promote a green sustainable image, the sector must cease the use of illegally extracted peat.

#### Fisheries and the Marine

The State of the Environment Report 2020 states that while Ireland's marine waters are clean and reasonably healthy, they are not as biologically diverse and productive as they could be. As an island nation with an extensive marine area, Ireland needs to ensure that robust governance and legal frameworks are in place to protect marine ecosystems and the services they provide to society. EPA notes that progress is being made in this regard. The Statement of Strategy should ensure that DAFM commits to its role in a governance system that will coordinate and integrate the implementation of relevant legislation (e.g., Maritime Area Planning Act) and directives where there are crossovers, such as those covering marine strategy, marine spatial planning, water quality, waste, biodiversity and protecting fish stocks.

#### Forestry

The forest sector can play a key role as a source of CO<sub>2</sub> removal from the atmosphere and has a central role in advancing the achievement of Ireland's commitments towards climate neutrality by 2050. It is important that this benefit is clearly recognised in the Statement of Strategy. The EPA has previously highlighted that it will be important to quantify the extent of forestry that will be needed in Ireland, consistent with meeting Ireland's climate commitments, and work backwards to determine the level of afforestation necessary to achieve the overall target. Greater ambition in terms of the annual afforestation target of 8,000 hectares per annum is required to achieve this.

#### Metrics

DAFM is actively engaging with the EPA and others on a European Environmental Network looking at developing sustainability metrics which may be used to evaluate the Common Agricultural Policy Strategic Plan and Food Vision 2030. DAFM and other national and European agencies are participating in a European Network led by the European Environment Agency on Food Systems. EPA welcomes that DAFM are the national lead on the Food Systems Group. One of the key tasks for this pan-European group, will assist in terms of metrics, is the development of food system sustainability assessment framework. The results from this work should deliver an overview of the existing national sustainability assessment frameworks and provide inputs to the Farm To Fork Strategy, and also to the evaluation of the Common Agriculture Policy Strategic Plan, the

Biodiversity Strategy for 2030 and policy coherence more broadly. In addition, as set out above there is need for metrics to track progress in relation to environmental challenges related to agriculture including on greenhouse gas mitigation, ammonia emissions reductions, water bodies impacted by agriculture and forestry and compliance.

#### Data Sharing

Data sharing is essential to track the impacts of agricultural and forestry activities on environmental outcomes. The Statement of Strategy should include a commitment to providing data to relevant stakeholders which is critical to fulfilling Ireland's compliance with a range of Environmental Directives. In this context, DAFM should commit to continued development and sharing of land use data that will contribute to the provision of national land evidence. Moreover, the importance of agricultural data to climate and water management is a key area where sharing should be explicitly committed to under the Statement of Strategy.

#### Land Use Evidence and Policy

Phase 1 of the Land Use review resulted in 19 recommendations. The opportunities to progress the recommendations pertaining to agricultural, forestry and soils domains could be included in the Statement of Strategy. EPA welcome the contribution of DAFM data and evidence to land mapping and monitoring, and the DAFM contribution to the national landcover map.

The EPA welcomes the commitment of DAFM to lead, enable and regulate the sectors in a way that optimises its contribution to social, economic and environmental sustainability. The challenges outlined above will all need to be addressed to ensure that DAFM can deliver on this commitment.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Micheál Lehane', written over a horizontal line.

**Micheál Lehane**

Director

Office of Radiation Protection and Environmental Monitoring

## **Appendix 1**

### **Key Messages from previous submission to DAFM**

The following recent submissions to DAFM should be considered in conjunction with this letter:

- [Implementation Plan for the Forest Strategy and associated Strategic Environmental Assessment](#) (January 2023)
- [Consultation on the development of a national horticulture strategy](#) (December 2022)
- [Seafood Development Programme 2021-2027](#) and associated Strategic Environmental Assessment (September 2022)
- [Better Regulation of Food in Ireland \("To-Be Report"\)](#) (July 2022)
- ["Shared Vision, Forest Strategy and Forest Programme"](#) (February 2022)
- [Common Agricultural Policy Strategic Plan](#) and associated Strategic Environmental Assessment (December 2021)

The submissions outlined above, in addition to those on [Food Vision2030](#), [AgClimatise](#) and the [Nitrates Action Programme](#), are of relevance to the agriculture, fisheries and forestry sectors. It is essential that there is consistency and alignment between these plans and programmes and the environmental objectives in other national plans/programmes (e.g. Climate Action Plan, River Basin Management Plan) and government policy.

The submissions above, taken together, have several common threads running through them of relevance to the development of the Statement of Strategy for DAFM, namely that:

- Agricultural and other land management practices, as well as the agri-food industry, are causing significant problems for water quality, air quality, nature and climate change and putting at risk the reputation of Ireland as a food producing nation with strong environmental credentials;
- Recognition of the opportunities available for Ireland in getting it right and being able to prove its credentials as a world leader in sustainable, low carbon and environmentally friendly agriculture and land management;
- The importance of comprehensive monitoring programmes in establishing the sustainability credentials for the agriculture, fisheries and forestry sectors and the need for a strong, reliable and independent evidence base to demonstrate and communicate the effectiveness of DAFM's plans, programmes and policies. In this context, the publication of interim monitoring reports (e.g. Common Agricultural Policy Strategic Plan, Food Vision 2030) would allow for monitoring programmes to be reviewed and modified to allow for any future changes to various environmental targets;
- Ireland has declared a climate and biodiversity emergency, and it is important that an appropriate sense of urgency in addressing these issues is reflected in the Statement of Strategy. The level of ambition in DAFM plans/programmes must match the significance and urgency of the scale of the environmental challenge that we face as a nation and the role of agriculture, fisheries and forestry, therein;
- Measures need to be more targeted to achieve our water quality objectives. They must be joined up and aligned across agricultural and environmental policies to achieve

multiple environmental benefits. These actions must be substantial and sustained with full accountability;

- Securing compliance with all existing and new environmental regulations needs to be given priority. The full suite of enforcement tools should be utilised, including support and advice, incentives, penalties and a strengthened enforcement and inspection regime;
- The importance of training, collaboration and data sharing are key drivers for ensuring compliance but also to enhance the evidence base to better inform assessments relating to water quality, emissions and land use.

END