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Re: AGRI-FOOD STRATEGY 2030, Strategic Environmental Assessment Scoping Report.

Dear Mr Edwards,

Thank you for your correspondence regarding the SEA Scoping Report for the proposed Agri-Food Strategy 2030.

The Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA) has considered the consultation document and our opinions are set out below.

The scoping in of transboundary issues is welcomed. DAERA would like the SEA Environmental Report to contain a clear statement indicating the opinion about whether or not the implementation of the of the strategy is likely to have a significant effect on Northern Ireland, in combination with any identified measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment.

Natural Environment Division Comments

A number of useful information sources that highlight the current state of the environment in Northern Ireland at a regional level and which could be referenced in appendix A are:

Northern Ireland State of the Environment Reports: https://www.daera-ni.gov.uk/publications/state-environment-report-2013

Northern Ireland Environmental Statistics Reports: https://www.daera-ni.gov.uk/articles/northern-ireland-environmental-statistics-report

In terms of the scoping of transboundary SEA issues, the objectives contained in table 4.1 are broad. When refining targets, the potential disturbance to/impact on NI/RoI migratory/mobile species such as salmon (for example within the River Foyle Special Area of Conservation use tributaries which are within both Northern Ireland and the Republic of Ireland), Hen Harriers (in the Slieve Beagh Special Protection Area adjacent to the border), Marsh Fritillary butterfly meta-populations, bats and breeding waders should be given consideration. Cross border peatlands, river basins, European sites in Northern Ireland adjacent to or with pathways to the Republic of Ireland and other landscape types also require special attention as ecological functionality and 'views' of landscape cross political boundaries.

Other relevant web-links are;
Designated Scientific Sites: www.daera-ni.gov.uk/landing-pages/protected-areas

Regional Landscape Character Map viewer: https://www.daera-ni.gov.uk/services/regional-landscape-character-areas-map-viewer

DAERA have a map browser for NI protected sites and known priority habitat: www.daera-ni.gov.uk/services/natural-environment-map-viewer

Appropriate Assessments should refer to the status of habitats and species in the relevant reports available on the JNCC website as follows: UK Article 17 report for the Habitats Directive https://jncc.gov.uk/our-work/article-17-habitats-directive-report-2019/ and the UK Article 12 report for the Birds Directive https://jncc.gov.uk/our-work/european-reporting/#birds-directive-reporting

Marine and Fisheries Division Comments

Marine Plan Team Response
The Marine Plan Team welcome the opportunity to comment on this Strategic Environmental Assessment (SEA) Consultation for the Agri-Food Strategy to 2030.

Sustainability Topics

Explicit reference to designated sites within the marine environment in the sub-topic of the Ecology and Nature Conservation topic of Table 2.2 Sustainability Topics is welcomed. However, it seems odd that the statement *"including those within the marine environment"* does not apply to all the other sub-topics listed within this topic. The reference to *"character of coastal areas"* is also welcomed within the sub-topic of the Landscape topic.

The Sustainability Topic on Water would benefit from explicit reference to marine waters within the sub-topic section. This would create a stronger link to the section on Transitional, Coastal (marine) and Canal on page 29, the pressures outlined in relation to offshore marine waters on page 31 and the SEA Objectives / Sub-Objectives on page 46. Similarly, consideration could be given to including an explicit marine reference within the Climate Change sub-topic with respect to global warming on sea temperatures. Within the Natural Capital topic the services provided by the marine ecosystem could also be highlighted.

Transboundary Considerations

The Report acknowledges (Section 2.6) that consideration of transboundary impacts with Northern Ireland is likely to be particularly relevant with some topics for example, ecology, climate, air, water and landscape and this is further acknowledged in Section 3.13 on Natural Capital. Yet, transboundary considerations have only been included (as sub-headings) in relation to Biodiversity and Nature Conservation and Air Quality within the Baseline Data chapter.

It is further advised that consideration should also be given to transboundary impacts with the Northern Ireland marine environment, particularly given the cross border loughs of Carlingford Lough and Lough Foyle. For example, Baseline Data on Water (section 3.6) includes a section on Transitional, Coastal (Marine) and Canal, yet there is no Transboundary Considerations section for this topic.

SEA Objectives

It is important marine aspects within the Sustainability Topics and sub-topics are reflected within the SEA Objectives and sub-objectives outlined in Section 4 and Table 4.1. This will ensure the assessment is robust and transparent in relation to the consideration of impacts on the marine environment and importantly potential transboundary marine environmental effects.

Annex A

It is noted both the DAFM (2012) Harnessing Our Ocean Wealth and DHPLG (2020) draft National Marine Planning Framework consultation have been included within Annex A. Given these inclusions and to take account of transboundary aspects in relation to the marine environment, it is advised that both UK Government (2011) UK Marine Policy Statement and DAERA (2018) draft Marine Plan for Northern Ireland should be included under the NI/UK section. This will strengthen the inclusion and consideration of potential transboundary marine environmental effects within the SEA Objectives and overall assessment.

Marine Strategy and Licensing Team Response

Understanding that this is a very wide scale SEA, but possible impacts on the Shellfish Water Protected Areas which are in the Lough Foyle and Carlingford

Lough transboundary areas need to be included as they have not been mentioned in the documentation provided.

Lough Foyle and Carlingford Lough contain Shellfish Water Protected Areas under Directive 2000/60/EC ("The Water Framework Directive"). These Shellfish Water Protected Areas contain commercial shellfish harvesting areas which must meet stringent bacteriological and chemical standards laid down in the Water Framework Directive (Classification, Priority Substances and Shellfish Waters) Regulations (Northern Ireland) 2015 and the EU Food Hygiene Regulations (EC/852/2004, EC/853/2004 and EC/854/2004). This must be taken into account when assessing any plan/project adjacent to a Shellfish Water Protected Area.

Inland Fisheries

DAERA Inland fisheries has within our jurisdiction several transboundary waterways the majority of which maintain populations of Salmonids, European Eels, Lamprey and several other species of significance.

The main catchments include (but not exclusively) –

1) The Skeoge in the Northwest, which drains to Lough Swilly.
2) The Erne and the Melvin/MacNean catchment which both drain to Donegal Bay.
3) The Castletown catchment with its two main Northern Ireland rivers of the Flurry and the Fane catchments which drain to Dundalk Bay.
4) The Blackwater which is part of the Lough Neagh/Bann catchment.

These rivers provide both a valuable game and coarse angling resource and also hold a considerable nature conservation and biodiversity value. Any environmental report should include these catchments and examine their potential for improvement and any possible impacts within these transboundary jurisdictions. The report also has the potential to identify mutually beneficially programmes of research and/or conservation. Whilst the report is primarily focussed on the designated sites (e.g. ASSI's, SPA's and RAMSAR's etc.) the opportunity should not be missed to consider ground and surface water bodies and how they are impacted by intensive agriculture and also possible approaches to achieve 'Good Ecological Status' as per the Water Framework Directive. The impacts of aquaculture sites within these catchments and their estuarine and coastal environments should be evaluated in full, for example, how sea lice and other parasites have the potential to significantly impact fisheries interests throughout these transboundary watercourses. Given the transboundary nature of these watercourses there is the potential for co-operation in regard to any legal framework for proposed development or permitting of works within these waterbodies and the potential impacts from such actions.

The Loughs Agency is the lead body for provision of advice regarding impacts to salmonid and inland fisheries interests within the catchments of Lough Foyle and

Carlingford Lough. Consequently, said agency should be consulted in relation to this consultation. DAERA Inland Fisheries will provide fisheries advice for those areas outside of the catchments of Foyle and Carlingford Loughs.

Historic Environment Division Comments

DfC Historic Environment Division (HED) operate via a Service Level Agreement with colleagues in DAERA in relation to SEA, whereby, we provide authoritative comment and advice in relation to matters of Cultural Heritage including archaeological and architectural heritage. We make the following comments in respect of the documentation received by our office on 12 August 2020.

HED welcome that cultural heritage is to be carried forward to environmental assessment stage. While we advise that we consider it unlikely that there would be direct adverse effects of this programme on Northern Ireland's Historic Environment, we note that as with landscape considerations many cultural heritage characteristics within the landscape have transboundary qualities and relationships which add to their understanding, and we highlight the presence of transboundary heritage assets such as historic routeways, earthworks and waterways.- Our historic environment datasets are available at the link below and may aid in environmental assessment.

https://www.communities-ni.gov.uk/publications/historic-environment-digital-datasets

In addition to the above we also highlight the value of considering potential impacts on understanding of transboundary post medieval vernacular heritage and historic settlement patterns, aspects of the historic environment which are very much intertwined with landscape, and which can be indicated through historic ordnance survey maps.

Should you have any queries in regard to the content of our response we can be contacted at the above address.

Yours sincerely

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NIEA, DAERA