[redacted]:

In document *'Strategic Environmental Assessment (SEA) Scoping Report'* Agri-Food Strategy to 2030 order:

3.2 Ecology and Nature Conservation. Page 14: 'European sites, also known as Natura 2000 sites…': the preamble here notes N2K sites and elsewhere refers to habitats but the text omits the overarching Article 2 objective of the Habitats Directive as explicit on the need to restore all Annex I habitats (and Annex II species) to favourable conservation status at Member State level - not just in N2K (SAC & SPA) sites. I believe and **the SEA should establish that there are very large areas of Annex 1 habitats outside of N2K sites.**

Article 10 of the Habitats Directive specifically covers obligations beyond N2K sites - *"Member States shall endeavour, where they consider it necessary, in their land-use planning and development policies and, in particular, with a view to improving the ecological coherence of the Natura 2000 network, to encourage the management of features of the landscape which are of major importance for wild fauna and flora....'*. This reemphasises the need to assess impacts beyond N2K sites and indeed to do this **in the context of *improving the ecological coherence/favourable conservation status of the whole Natura 2000 network (i.e. including all Annex 1 habitats).***

This context - of **improving the ecological coherence/favourable conservation status** – of Annex 1 habitats should be reflected in the section: Conservation Status (Page 16).

Table 4.1: SEA Objective: 1. Ecology and Nature Conservation – Protect, restore and support Ireland's unique biodiversity assets – the table should explicitly reflect my above points about Annex 1 habitats by adding a further bullet along the lines: **Improving the ecological coherence/favourable conservation status of Annex 1 habitats outside N2K sites**.

5.2 Reasonable Alternatives Considered. Add a further scenario: **an alternative to the #EUGreenDeal in agriculture is the production line and the unlimited race for the intensity and mass production of agricultural production. At the end of this race, there will be no more family farms, but large agro-industrial networks.**