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RE: Department of Agriculture, Food and the Marine – Strategic Environmental Assessment (SEA) Scoping Report: Agri-Food Strategy 2030

Irish Water welcomes the opportunity to comment on the departments Strategic Environmental Assessment; (SEA) Scoping report for the agri-food Strategy 2030. In the coming years Irish Water will invest nearly €5 billion in the continued improvement of our water and wastewater services. This investment will ensure secure and sustainable water and wastewater services, essential for health, our communities, the economy and the environment.

Irish Water seeks to support national policy objectives including those relating to Irish agri-food, forestry and the marine. In particular we recognise and support the sustainable development of the agri-food, forestry and marine sectors and optimising its contribution to national economic development and the environment.

Below we have set out areas for further consideration in the SEA

Water availability

We note in the scoping report Section: *Ireland's Water Resource and Condition the statement that "Ireland has a water network comprising 84,800 km of mapped river channels, 12,000 lakes, 514 groundwater bodies, 844 km² of estuaries and 13,325 km² of coastal waters (EPA, 2019). Abstraction of water from the groundwater system for primary production is negligible due to high rainfall and the relative absence of irrigation systems."*

Irish Waters responsibility involves providing over 3.9 million customers with an average of 1.7 million litres of drinking water each day via a network of 1,208 groundwater and surface water abstractions, 788 individual water treatment plants and 63,000 kilometers of distribution network. Historically this service was provided by 31 individual local authority water service functions. Under this management model, water supplies in many areas developed over time on a reactive basis, based on the need in the immediate vicinity. As a result, outside the main urban centers, water supplies are generally characterised by a

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fragmented network of isolated supplies, often abstracting from relatively small waterbodies, causing reliability / sustainability issues and the potential for environmental impact.

The situation, although manageable in the short term, will become increasingly untenable due to population growth, competing needs for water within catchments (including changes to agricultural land use), more stringent environmental conditions on water abstraction, and climate change impact. In addition to this, although as a country our average rainfall is relatively high, it is unevenly distributed, with more in the west than the east. The areas with lowest rainfall happen to have the greatest population density (although this density is low compared to European norms), and also have the most intensive agricultural production. This means that water resources in our more populated areas are locally under pressure.

Irish Water is currently in the process of developing its first National Water Resources Plan (NWRP). The NWRP is Irish Waters strategic plan that sets out how we will move towards an environmentally sustainable, secure and reliable drinking water supply over the next 25 years. This, involves assessing the external factors that will impact on our water supplies, including changing environmental legislation, government policy on growth, spatial planning, water usage patterns and climate change, and developing a plan to ensure that existing water assets are managed in the best possible way to ensure security of supply and minimise impact on the environment. The plan also provides the framework for developing new water supply assets that will improve the reliability, sustainability and resilience of the water supply over the coming regulated investment cycles.

One of the first steps is to carry out a detailed assessment of the current demand for water in every water supply across the country, including; domestic, non-domestic, operational use and unaccounted for water, peaking and headroom needs. We then forecast water requirements over the next 25 years including growth, leakage reduction and changing water use patterns. Further to the demand assessments, we review our existing water sources (including environmental impact considerations) to see if these are capable of meeting the water demand forecasts, this is known as a Supply Demand Balance assessment. Where water sources or treatment plants do not have sufficient capacity to meet our needs we say our supply demand balance for an area is in deficit. As part of our first supply demand balance assessment, we have identified that, based on our current water supply assets, over 50% of our water supplies are currently in deficit or will fall into deficit at some stage over the next 25 years if we do not intervene. This means that the reliability of our water supplies is suboptimal and that, if we do nothing, our existing customers will experience interruptions to supply with increasing frequency, and our ability to cater for population and economic growth could be impacted. Consideration should be given to proactive multi-stakeholder resource planning at a catchment level, to ensure that these future challenges can be met

Integrated Catchment Management

Irish Water's vision detailed in the Water Services Strategic Plan is that "*Through responsible stewardship, efficient management and strong partnerships, Ireland has a world class water infrastructure that ensures secure and sustainable water services, essential for our health, our communities, the economy and the environment*".

Irish Water prepares Drinking Water Safety Plans (DWSP) which seek to protect human health by managing risks to water quality, taking a whole catchment approach to manage risks from source through to the tap. Both the World Health Organisation (WHO) and the EPA strongly endorse the Drinking Water Safety Plan approach to managing drinking water supplies effectively in the interests of public health. Protection of the water source is the most effective way of reducing the cost of water treatment. Catchment management is a process that recognises a catchment as the appropriate unit for understanding and managing land, water and ecosystems and guides people towards an agreed vision for their catchment, and towards acting together to manage it. Water quality in catchments is impacted by multiple pressures, from various sources including wastewater and agriculture. A balanced approach between the sectors is required, with impacts from wastewater services and agriculture being addressed as part of a coordinated approach in each catchment, towards the achievement of agreed water body objectives.

A number of pesticides have been detected in low concentrations in a large number of rivers across Ireland over the past number of years. With the proposed intensification of agricultural production, there is a risk that pesticide usage may increase, with a resultant potential increase in drinking water supplies with Pesticide failures. DAFM have been working with Irish Water as part of the National Pesticides and Drinking Water Action Group (NPDWAG) to promote the use of Integrated Pest management and to follow best practice when using any pesticide product, especially in the vicinity of a drinking water source.

To ensure that agricultural production is environmentally sustainable we would propose that the catchment management approach promoted by the EPA and other stakeholders in Ireland should be incorporated in the SEA and include actions / commitments in relation to the sustainable use of pesticides.

Conclusion

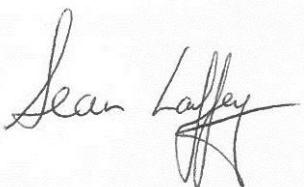
Irish Water would welcome consideration of the key areas identified above in the SEA and make the following specific suggestions:

- Section 3.6 Water: include a subsection on baseline water availability and discuss baseline of pesticides in catchments.
- Section 3.13 Key Environmental and Sustainability Issues and Likely Future Trends: include the following issues:
 - Increased detections in pesticide pollution, much of which is linked to agricultural activity;

- Risk of reduced water availability due to climate change
- Section 4.1 SEA Objectives: Under objective number 5 include an objective relating to the protection of drinking water sources.
- Appendix A Review of other Plans and Programmes: include Irish Water plans (<https://www.water.ie/projects-plans/our-plans/>), in particular:
 - Irish Water Water Services Strategic Plan
 - Irish Water National Water Resources Plan (when published)

We look forward to continued collaboration with the department to ensure a safe and secure water supply and the sustainable development of the agri food, forestry and the marine.

Regards



Sean Laffey
Head of Asset Management