CAP Rural Development Division

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RE: DRAFT INTERVENTIONS FOR CAP STRATEGIC PLAN 2023-2027

To whom it may concern

Irish Water welcomes the opportunity to make a submission the draft interventions for the CAP Strategic Plan 2023-2027. We appreciate the departments consideration of our previous submission on the CAP SWOT analysis and Environmental Scoping Assessments and the Proposed Agri-Environment Results Based Pilot Project .

The intensification of agricultural production in Ireland could lead to an increase in fertiliser usage and slurry spreading (and pesticide usage), with associated risks to water quality and public drinking water supplies. It is imperative that drinking water sources are protected from the risks associated with increased agriculture production. The agricultural sector has huge potential, and capability, for implementing measures and interventions which can deliver multiple benefits; including for water quality, human health, sustainability, biodiversity, climate change mitigation and adaptation, and flood mitigation. Appropriate support should be given for farmers to implement measures for the protection of the environment to maximise these outcomes.

The protection of drinking water sources should be afforded special consideration and status in the interest of the protection of public health; in recognition of the seriousness and severity of the potential consequences of consumption of contaminated drinking water. Protecting and restoring the quality of raw water is an effective and sustainable means of reducing the cost of water treatment in line with Article 7(3) of the Water Framework Directive (WFD) and the Recast Drinking Water Directive (DWD).

Irish Water's Water Services Strategic Plan (WSSP) was published in October 2015 and sets out strategic objectives for the delivery of water services over a 25 year

timeframe to 2040. One of the strategic objectives for Irish Water outlined in the WSSP is to ensure a safe and reliable water supply. Irish Water activities that contribute to improving the resilience of drinking water supplies and the safe use of bio-solids include:

- The National Water Resources Plan (which seeks to address issues around the availability of water);
- Drinking Water Safety Plans (which address issues around the quality of water);
- Working towards a partnership approach for drinking water source protection;
- Commencement of delineation of abstraction catchments; and
- National Wastewater Sludge Management Plan.

National Water Resource Plan (NWRP)

Irish Water has prepared a National Water Resources Plan which is a 25 year strategic plan for the entire public water supply. The plan is being delivered in two stages. Stage 1 (National Water Resources Plan Framework) sets out the methodology used to assess need across the public water supply in terms of quality, quant ity, reliability and sustainability, and summarises the 'identified need' on a national basis

Following on from the public consultation on Phase 1 NWRP draft Framework Plan and associated environmental reports, the submissions and observations received from public consultation have been taken into consideration, and the NWRP Framework Plan updated.

The NWRP Framework Plan has now been adopted, accompanied by a Strategic Environmental Assessment Statement and an Appropriate Assessment Determination. A Consultation Report summarising feedback received during the public consultation has also been published which can be viewed here: https://www.water.ie/projects-plans/our-plans/nwrp/.

Stage 2 will involve the development of four regional water resources plans which will identify plan-level approaches to address the identified need in a sustainable manner. The approaches are focussed on both the supply and demand aspects of public water supply and can be summarised as:

- Use Less – water conservation measures;

- Lose Less – leakage reduction and network efficiency;
- Supply smarter – sustainable supplies (including options for conjunctive use).

The regional plans align with the requirement to support balanced regional development, and will include for inter-region or inter-catchment water supplies, where required, to ensure adequate water provision into the future. There will be a focus on efficient, environmentally sustainable water use; and on providing for reliability and security of supply (i.e. system resilience). It is proposed that the water resource planning process incorporates all information on significant pressures in relation to abstractions, as it becomes available, in order to ensure alignment with the requirements of the third cycle RBMP.

Drinking Water Safety Plans (DWSPs)

Irish Water has adopted the World Health Organisation (WHO) Water Safety Plan approach. Drinking Water Safety Plans (DWSPs) seek to protect human health by identifying, scoring and managing risks to water quality and quantity; taking a holistic approach from source to tap. The 'source' component of DWSPs is a key component and a priority within Irish Water, as protecting and restoring the quality of raw water is an effective and sustainable means of reducing the cost of water treatment in line with Article 7(3) of the WFD.

The DWSP source risk assessments undertaken to date indicates that the most common issues in relation to raw water quality in Irish catchments include cryptosporidium, sediment, colour, ammonia and pesticides. The following 'hazardous events' (or risks) identified in DWSP that relate to activities within the catchment are set out below:

- Agricultural activities causing biological contamination;
- Agricultural activities causing chemical (dangerous substances) contamination;
- Agricultural activities causing nitrates/phosphates contamination;
- Livestock accessing well head area causing biological contamination (and elevated sediment levels); and,
- Livestock accessing the vicinity of the surface water/spring intake causing biological contamination (and elevated sediment levels).

Working towards a partnership approach for drinking water source protection

Irish Water is committed to working with public bodies and other stakeholders towards a common goal of the protection of drinking water sources. Partnership arrangements such as the National Pesticide and Drinking Water Action Group (NPDWAG) and the Catchment Focus Groups could support the development and implementation of catchment-level action plans for drinking water source protection in higher risk catchments.

Irish Water has published its Interim Pesticide Strategy (http://13.74.153.16/projects/strategic-plans/interim-pesticide-strategy/). It covers Irish Water's collaboration with all the NPDWAG members and other stakeholders. It provides a risk management framework to understand and manage pesticide risk within drinking water catchments for public water supplies. Irish Water will also develop a longer-term catchment management strategy for drinking water source protection which is in line with the Recast DWD. The DWSP will form a central part of this strategy and help to embed it.

Irish Water is involved in two pilot drinking water source protection projects which aim to trial catchment scale interventions to reduce the risk of pollution in water supplies. Such interventions broaden the water awareness agenda and foster active community engagement around other water issues. In the third River Basin Planning cycle, the partnership approach can be developed further and implemented more widely to assess and manage risks to drinking water sources; however funding and resources are required in this area.

Delineation of abstraction catchments

Irish Water has delineated interim groundwater abstraction zones of contribution and surface water abstraction catchments for public water supplies.

National Wastewater Sludge Management Plan

Irish Water currently produces approximately 59,000 tonnes of biosolids (treated dry solids) per annum. These biosolids are currently re-used in agriculture in accordance with the GAP Regulations. In accordance with Irish Water's National Wastewater Sludge Management Plan, published in 2016, the preferred option for re-use of biosolids is reuse on land, with non-food tillage crops and energy crops being the primary focus.

COMMENTS ON DRAFT INTERVENTIONS

To afford the protection of drinking water sources and the safe use of biosolids, Irish Water has provided the following responses to the questions posed in the consultation document.

A Should Ireland implement capping at an effective rate of €66,000 or €100,000, or at a rate in between?

No comment.

b. Should internal convergence stop at 85% of the national average payment entitlement value in 2026, or should it go to a higher percentage?

No comment.

c. Should Ireland go beyond the 10% of direct payments to redistribute from larger to smaller or medium-sized holdings? Or should Ireland seek to use the derogation to reduce the percentage? Should this funding be redistributed to farmers with holdings of less than 30 hectares?

No comment.

d. Should Ireland go beyond the 25% of direct payments to be allocated to eco-schemes? Or should Ireland use the flexibility in the regulation to reduce the percentage allocated to eco-schemes?

Irish Water would support the view that the Eco-Scheme should be "for all farmers" with the objective being to maximise farmer participation to achieve climate and environmental improvements. Therefore we believe that the allocation should go beyond the 25% of direct payments to meet this objective.

We support the following proposed actions in particular to allow for the protection of drinking water sources:

> *3. protection or improvement of water quality and reduction of pressure on water resources;*
>
> *6. actions for a sustainable and reduced use of pesticides, particularly pesticides that present a risk for human health or environment;*

e. What aspects of the current system do you consider unfair, and what is the best combination of all of the above mechanisms in order to bring about a fairer distribution of direct payments?

No comment.

f. Should there be a specific intervention to incentivise gender equality?
No comment.

If you have any queries on our submission, please do not hesitate to contact us.

Yours sincerely

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