



National Federation of Group Water Schemes

Society Limited

Website: www.nfgws.ie

27th August 2021

NFGWS Submission to Department of Agriculture Food and the Marine on the review of the CAP Strategic Plan 2023-2027

The National Federation of Group Water Schemes (NFGWS) is the representative organisation for the community-owned group water scheme (GWS) sector in Ireland. Since its establishment in 1998, the organisation has worked in partnership with Government Departments, Local Authorities (LAs) and other State and non-State stakeholders to ensure that the services provided by our GWS members achieve the highest standards in terms of water quality and consumer service.

The NFGWS welcomes the opportunity to participate in this consultation process, as we have been working closely with the Department of Housing Planning and Local Government and the Department of Agriculture Food and the Marine on designing and implementing targeted, results-based source protection strategies as recommended in the River Basin Management Plan (RBMP) 2018 – 2021, the Drinking Water Directive and the Drinking Water Regulations.

The current CAP

CAP funding of farmers, many of whom are group water scheme members is critical to the economic and social wellbeing of rural areas. The current CAP model delivers payments based largely on the quantity of 'productive' land owned. This incentivises farmers to productively manage **all** of their lands, 'improving' even marginal areas to make them eligible for payments. In effect, it has encouraged turning fourth grade land (in production terms) into third grade land, supported field drainage, the removal of established hedgerow and tree cover, and the infill of wetlands. Apart from failing to acknowledge the biodiversity, water quality, carbon sequestration and flood mitigation benefits of such assets, the current CAP actually penalises them.

Impacts of current policy

'Productive' (especially grassland) farming on marginal lands and improved grasslands that bound water bodies is a major contributor to poor water quality in Ireland's lakes, rivers and groundwaters, as attested by the EPA and as recognised by the proposed changes to the CAP itself. The resulting contamination from phosphorous, nitrogen, faeces, sediment and herbicides has had a negative impact on drinking water sources that are vital to the health, wellbeing, social and economic survival of rural Ireland.

In addition to its implications for water quality, an unintended consequence of the previous CAP's primary focus on production has been its devastating impact on biodiversity. Across Ireland, the relentless move

towards grassland monoculture has resulted in habitat loss and the decline of species. The move towards intensified agricultural practises and use of ever-larger farm machinery has damaged entire ecosystems, many of which have been lost and many more that are threatened.

Addressing the Crises

Beyond the need to end avoidable pressures on water quality, the biodiversity and climate crises demand that we act with a sense of urgency, prioritising measures and actions that will halt and reverse the decline. These crises cannot be effectively addressed without community (including farmer) buy-in and engagement. The NFGWS has established, through source protection initiatives over nearly 20 years, that it is possible to harness the goodwill of individual farmers and to secure wider community buy-in to the ongoing process of source protection. To facilitate such involvement, farm incomes must be fully protected and enhanced where a farmer commits to measures that address the crises we currently face.

Our sector was built on the goodwill of Irish farmers who donated sites for pumphouses and reservoirs and allowed pipe networks to run through their lands. We were not surprised then that our source protection pilot projects have secured co-operation from individual farmers in establishing vegetative buffers/targeted fencing on their lands for the good of their communal drinking water supply. A lot more could be achieved in this regard were it not for the fact that under the current system a farmer may actually lose payments on what is then categorised as 'non productive land'.

Addressing contaminants at catchment level is much less costly and is arguably more effective than implementing hard engineering solutions at the treatment stage. This is particularly true of a contaminant such as herbicide. The Integrated Source Protection Planning (ISPP) approach pursued by the NFGWS is informed by a simple principle that the new CAP might also adopt; 'the right measure in the right place'. We recommend our guidance booklet 'A Handbook of Source Protection and Mitigation Actions for Farming'. to the wider farming community and to agricultural advisors.

Policy Shift

The NFGWS heartily welcomes the shift in policy which places a greater emphasis on the protection of the environment at large under Pillar II. The main questions to be addressed relevant to the NFGWS is the following;

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?

As the purpose of the Eco Scheme Intervention is to provide additional direct income support to farmers (Pillar 1) for undertaking actions beneficial to climate, water quality, biodiversity and the wider environment:

- The NFGWS recommends that Ireland should have a minimum of 25% of direct payments allocated to eco-schemes and should not use flexibility to reduce that percentage.

In our view, the new CAP must include the following if we are to avert a worsening crisis and ensure a future for Irish farming and rural society:

- It should take on the learnings of EIPs (such as the Burren and Bride projects)
- It should ensure that agricultural policy is fully aligned with the Water Framework Directive, Climate Action and Biodiversity targets, with particular regard to results-based practices that protect water bodies from contamination and, at the same time, reconstitute habitats.
- It should encourage **all** farmers to opt-in to the new eco-scheme.
- It should, where necessary, provide additional supports to farmers in Critical Source Areas (CSAs) of water bodies where a mitigation measure has been identified that may impact on a farm income.
- The proposed 30% parcel limit should be removed, as it may negatively impact small parcel holders where there is a large feature requiring protection.¹ This would ensure that for areas of certain non-agricultural features, a farmer would not have to remove them to allow draw down of a BISS payment, Eco Scheme, or any Pillar II area-based payments.

While environmental scheme supports have been available for many years, it is our firmly held view that 'environmentally sustainable' models of farming will only be generally adopted if the levels of financial support under the new CAP are sufficiently attractive to encourage uptake on a more general and long-term basis.

In reference to both 'Continuous Professional Development for Advisors', the NFGWS views this as an essential element of the CAP strategic review. We propose that training in drinking water source protection be provided to **all** Agricultural Advisors. This would highlight the potential unintended impacts of various agricultural activities on water quality, as well as outlining the various appropriate mitigation measures that might be implemented.

Similarly, the Knowledge Transfer Programme is an excellent vehicle for farmers to share their experiences and solutions in various areas. We would welcome the establishment of dedicated knowledge exchange groups for those farmers who are farming within a drinking water catchment, highlighting the targeted measures that may be required to prevent pollution of sources from pesticides, nutrient, chemical and microbiological contaminants.

Regarding the supports offered to farmers under capital programmes (i.e. TAMS), the NFGWS would suggest that a targeted measure be made available to landowners who wish to invest in a water quality, water conservation, climate resilience or a biodiversity enhancement project. For example, capital funding for projects that will improve climate resilience and habitat restoration would be of benefit in addition to the more general supports being provided.

This submission should be read in conjunction with our prior submission on the draft CAP

(Common Agricultural Policy (CAP) - Supports to encourage water protection with add-on benefits for biodiversity enhancement)

We hope the comments and suggestions contained in this submission can be positively considered as part of this review process. Should you require any clarification of further information, please contact us.

¹ From 1 January 2023, it is proposed to allow *up to* 30% of a parcel consisting of features that may be beneficial to water protection, climate or biodiversity to be considered eligible.