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## **Re: Environmental Assessment of Ireland's CAP Strategic Plan 2023-2027**

To whom it may concern

Irish Water welcomes the opportunity to make a submission on the Environmental Assessment of Ireland's CAP Strategic Plan 2023-2027.

### **Q1. Do you have any observations on the conclusions in the Environmental Report and Natura Impact Statement?**

Irish Water thanks the department for consideration of our previous submission on the SEA scoping report and Draft Interventions.

**Q2. Having reviewed the Environmental Report, please provide comments on individual sections in more detail. Please ensure to state clearly the section of the Environmental Report and page number (if relevant) that your comment or submission relates to.**

### **PG 47 RE National Water Resource Plan (NWRP)**

On pg 47, the SEA states that the NWRP is in draft format. As advised in our submission on the scoping report, please note that the NWRP was published in December 2020 and can be accessed [here](#).

The SEA should consider Irish Water's NWRP as part of the assessment.

### **PG 47 re Water Services Strategic Plan (WSSP)**

On pg 47, please include reference to the objectives of the Water Services Strategic Plan relating to drinking water source protection which is to "*Manage the sustainability and quality of drinking water from source to tap to protect human health.*"

### **PG 115 re SEA objectives**

On pg 115, under SEA topic Water Resources, the SEA Objective is to "*Maximise the protection and enhancement of the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystem (quality, level, flow)*".

We welcome the addition of sub question "*6. Protect and improve drinking water sources as required under the water framework directive and recast drinking water directive.*"

We would also suggest that the sub question should be included as an objective, either as part of the overall objective or as a separate heading, as the current objective relates solely to ecosystems.

**Q3. Having reviewed the Natura Impact Statement, please provide comments on individual sections in more detail. Please ensure to state clearly the section of the Natura Impact Statement and page number (if relevant) that your comment or submission relates to.**

No Comment

**Q4. Is there any additional information which in your view should be considered in the Environmental Report and/or the Natura Impact Statement? Please specify.**

No Comment

**Q5. Are there additional mitigation/monitoring measures that you would like to propose? Please specify.**

**Mitigation measures**

**Pg 176 re Capacity building and training**

We would request that specific reference to training for protection of drinking waters is included.

### **P 179 AECM General Tier 2 – Planting Tree**

Irish Water recommends that planting of native woodlands for the protection of water sources should be included.

**Q6. If you wish to make comments on the draft CAP Strategic Plan 2023-2027 (CSP), please ensure to state clearly the section of the draft CSP and page number (if relevant) that your comment or submission relates to.**

Irish Water support the proposal that Eco-Scheme should be “*for all farmers*” with the objective being to maximise farmer participation to achieve climate and environmental improvements across all farmlands. We also support the addition of the following to allow for the protection of drinking water sources:

- National contribution to the EU 2030 targets of 50% reduction of the overall use and risk of chemical pesticides, and use of more hazardous pesticides
- Obj5 O1: Improve water quality and implement catchment-based approach

### **Pg 72-77**

Whilst the SEA has addressed drinking water source protection it has not been highlighted as a priority in the CSP objectives under **Obj5.N2 Protect and improve water quality**. Under the Water Framework Directive and with the new Drinking Water Directive there is a requirement to protect and improve drinking water sources to reduce the level of water treatment required.

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. We believe that appropriate support should be given for farmers to implement measures for the protection of the environment to maximise these benefits.

To date the application of agri-environmental schemes has focused largely on biodiversity improvements and not improvements in source water quality. We believe the protection of drinking water sources should be afforded special consideration 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.

Irish Water welcomes further discussions and looks forward to working collaboratively with all stakeholders to support drinking water source protection.

Yours faithfully



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Director of Asset Management & Sustainability