



# National Federation of Group Water Schemes

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## **National Federation of Group Water Schemes Submission as part of the ‘Public Consultation on the Environmental Assessment of the draft CAP Strategic Plan 2023-2027’**

The National Federation of Group Water Schemes (NFGWS) is the representative body for the community owned group water scheme (GWS) sector in Ireland. We welcome the opportunity to make this submission as part of the above consultation.

The NFGWS believes that the new CAP arrangements must take particular cognizance of the need to protect those aquatic bodies that provide drinking water sources. We further believe that the current proposals do not go far enough in this regard, particularly in relation to Pillar I supports. A decisive shift is needed, away from a ‘production-focused approach’ towards an ‘environmentally-sustainable approach’, particularly in those parts of the country where topography, soils, subsoils and bedrock are unsuitable for intensification.

As an earnest of its commitment to meaningfully address the negative environmental impacts of support measures under the CAP over almost 50 years, we believe that the proposed 25% of funding under the new CAP directed towards Eco schemes should be increased to no less than 30% and that the bulk of this should be directed towards measures that will protect and improve the aquatic environment. While we welcome the additional conditionality from a water quality perspective, we do not believe it goes far enough to protect and improve the quality of water in drinking water catchments. More targeted measures, including the planting of ‘smart’ vegetative buffers in areas identified as having preferential flow pathways to drinking water sources, need to be retrospectively applied. These measures will have wider biodiversity and climate co-benefits.

As part of its submission under the Significant Water Management Issues in relation to the River Basin Management Plan (RBMP), the NFGWS proposed that all delineated catchments supplying drinking water be included as priority areas for action (PAAs). This has now been included in the draft RBMP and while we welcome the inclusion of all PAAs in Pillar II (Tier 1 of AECM), we believe that in order to properly mitigate against drinking water contamination from agricultural sources, these areas also need to be prioritised as part of the BISS payment in Pillar I.

We believe that excluding livestock from water courses should be a requirement of CAP supports on all farms in drinking water catchments. While we recognise that this is already a requirement on derogation farms, it should be extended through CAP support to all holdings in such catchments. As loss of drinking water sources for livestock will be a major stumbling block for farmers, we further believe that an alternative should be provided without cost to the farmer, either through connection to a potable water main, construction of nose pumps, ram pumps or solar pumps (depending on local conditions) and appropriately-positioned troughs to minimise the impacts of poaching.

The over subscription to REAP and the positive uptake of farmers participating in NFGWS source protection pilot projects, demonstrates that farmers are willing to participate in environmental measures that will address pressures on the aquatic environment. However, rather than adopting a scattergun approach, supports under these measures must be targeted towards areas of greatest need and with the greatest potential for co-benefits to biodiversity, climate etc. The framework approach used by the EPA, LAWPRO and the NFGWS to prioritise critical source areas should be adopted by the DAFM. This approach would support the inter-departmental approach proposed in An Fóram Uisce FILLM.

The increasing rate of phosphorous, pesticides and sediment contamination of surface water sources, in addition to the continued problem of microbiological and chemical contamination arising principally (though not exclusively) from agricultural activities, are particular pressures that must be addressed. It appears that the focus on nutrient management planning to date is simply not working in those areas of the country where the risk of run-off to water bodies is greatest.

Similarly, the CAP needs to comprehensively address the continued destruction of habitat, including hedgerow and wetlands, all of which provide incalculable value to our aquatic environment by filtering out or absorbing nutrient, mitigating flood risk etc.

ENDS.