National Federation of Group Water Schemes
Society Limited
[redacted]

10th October 2019

Re: NFGWS submission on Ireland's SWOT analysis for the CAP Strategic Plan post 2020

To whom it may concern:

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 the Government Departments, Local Authorities (LAs) and other state and non-state stakeholders to ensure that the services provided by our GWS members achieves the highest standards in terms of water quality and customer service.

We very much appreciate the opportunity provided to our organisation to contribute to the discussions around the Common Agricultural Policy through this public consultation. Please find below a completed response form outlining our suggestions for consideration on the SWOT analysis for the CAP strategic plan post 2020 for three of the specific objectives (d, e, and f).

In addition, the NFGWS strongly feels that consideration should be given to a new national Agri environmental scheme to support farmers for ecosystem services where they are farming in critical areas of drinking water source catchments. By adopting a less intensive farming regime in such areas and implementing targeted measures to protect drinking water sources and promote biodiversity, such a scheme would greatly assist in improving water quality and help Ireland meet its environmental objectives.

We hope our observations and comments will be considered by the Department when completing the final CAP SWOT analysis.

Yours Sincerely

Adrian Smyth

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NFGWS Development Officer (Biodiversity)

Roisin Dowd Smith

Róisín Dowd Smith

NFGWS Development Officer (Climate Action)

RESPONSE FORM

1. Details:

Full Name: Adrian Smyth and Roisin Dowd Smith

Organisation where applicable: National Federation of Group Water Schemes

Please tick one of the following options that best describes you;

Farmer (full-time)		Farmer (part-time)		Farm family member	
Member of the public		Other	√		

2. Are you involved in;

Agriculture		Forestry		Farm Organisation	
Rural Development		Food industry		Environment	
Community Sector	√	Research		Civil Society / NGO	

Other:_____

3. The Three specific objectives we have commended on are:

(d) contribute to climate change mitigation and adaptation, as well as sustainable energy;

(e) foster sustainable development and efficient management of natural resources such as water, soil and air;

(f) contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes;

4. SWOT

Objective 4; Contribute to climate change mitigation and adaptation, as well as sustainable energy;

Strengths	Weaknesses
• Increasing numbers of community owned group water schemes are engaging with farmers in their catchments towards implementing measures that will mitigate against the impacts of climate change, not least in the area of water conservation. • The move to usage-based charging for excessive use and non-domestic water consumption has resulted in reduced source abstraction, reduced energy use (pumping and treatment), reduced desludging and reduced pressure on infrastructure. • Group water schemes are emerging as leaders in the application of green technologies and are open to new ideas on reducing both operational costs and their carbon footprint.	• Energy demand is the single greatest contribution from the water services sector to CO2 emissions. • Excessive water demand on water networks (both on supply side and consumer side) imposes an additional (and avoidable) strain on energy demand. • To date, there has not been an assessment of the contribution of the water services sector *in Ireland* to CO2 emissions and, therefore, reduced targets cannot be set either for individual water supplies or for the sector as a whole. • The potential for the successful promotion of particular technologies aimed at reducing mains energy demand will depend on local limiting factors, including topography.
Opportunities	Threats
• There is an opportunity for the DAFM to develop new environmental schemes that support farmers, farming in drinking water source catchments to do so less intensively, particularly on land not capable of supporting intensive regimes or in critical source areas without being negatively impacted financially. There are opportunities to use these critical source areas to support forestry, and sequester carbon. • Group water schemes are uniquely positioned to engage with farmers in their catchment to promote behavioural change in relation to eliminating water wastage, rainwater harvesting and encouraging less intense farming regimes on land not capable of supporting such practices in drinking water source catchments. • There is an opportunity to promote the implementation of rainwater harvesting on farms and farm buildings. The Learnings from research undertaken in these areas	• Continued expansion and intensification of farming, leading to increased water and energy demands • Limited funding incentives to support of green technology adoption. • Connections to the National Grid for micropower generation is not currently permitted • Increased risk of flood/drought or extreme weather events can impact on farm production & animal welfare.

should be taken into account e.g. the National Rural Water Services Committee Research project on rainwater harvesting completed in 2005 by DIT. This is particularly relevant from a climate changes perspective as such systems would reduce reliance on water suppliers during times of drought. • The promotion of tree growing along hedgerows or throughout grassland would not only support biodiversity and sequester carbon but also provides shelter for animals during extreme weather events. • Additional training could be made available for farmers on some of the above measures. • The adoption of green technologies, such as hydropower turbines and solar panels – in addition to source protection measures - could contribute to this objective. • There is potential for greater collaboration with third level institutions on the piloting of innovative sustainable and green technologies.	

Objective 5; Foster sustainable development and efficient management of natural resources such as water, soil and air

Strengths	Weaknesses
• There are current agri-environmental schemes in place that have indirectly played a part in drinking water source protection • Each regulated GWS has had its Zone of Contribution mapped and, following on from this, all field systems within each catchment have been identified. This coupled with the development of a framework for drinking water source protection has enabled schemes to work with landowners towards implementing targeted and appropriate source protection mitigating measures in critical source areas. • The Rural Water Programme has facilitated a massive reduction in water demand across the GWS sector. • The majority of GWSs nationally, charge for water based on consumption on farms and this encourages water conservation. • EPA abstraction regulations monitor abstraction on all water supplies	• There is currently little national legislation or agri-environmental schemes that adequately deals specifically with drinking water source protection. • Farm expansion and intensification is resulting in increased pressures on our water resources • Many of the Agri-environmental schemes are not assessed for a results-based payment. • The inability of certain land to take the inputs being applied to it is amongst the greatest weaknesses and threats to environmental sustainability, and this is related to intensification and the nitrates regulations. • Further Intensification in land not capable of supporting it (heavy soils or free draining soils) could result in further pollution and subsequent Phosphorus loading in watercourses and Nitrogen loading in groundwaters

nationally.	
Opportunities • Education to improve the level of understanding of all farmers of the consequences of particular actions through mediums such as discussion groups and knowledge transfer. • Increased resources towards enforcement of existing environmental regulations/legislation to protect water resources • Education on surface and groundwater water source protection should be rolled out nationally for every land manager. This could be linked to existing programmes, such as GLAS or KT discussion groups. • Increased targeted funding under the Rural Water Programme could see further reductions in water wastage and increased source protection. • Increased scrutiny of planning applications for potential water pollution sources (e.g. land drainage, construction of slatted tanks etc.)	Threats • Changing climatic conditions and the likelihood of prolonged periods of drought conditions, coupled with farm expansion (Food Harvest 2025) will place further strain on already depleting water resources. • Current reliance on land managers to take part in source protection measures where there may be some financial loss. • Rural depopulation (i.e. the migration of younger people from farming backgrounds to urban areas) may result in there not being enough of the younger generation involved in farm management who, had they remained on the land, were more likely to implement the climate-friendly measures that are needed.

Objective 6; Contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes

Strengths • Landowners engaging with local Group Water Schemes to implement programmes such as 'Woodlands for Water' and 'Trees on the land' as part of drinking water source protection measures • Existing knowledge on pollution mitigation measures for watercourses and source protection. • Habitats Directive has proven to be very effective in the protection of our native species, although more work is required. • The National Federation of Group Water Schemes and the National Biodiversity Centre's joint publication 'pollinator friendly management of GWS sites' has been received with	Weaknesses • In the 2015 fitness check of the Habitat's Directive, it was reported that there has still been no marked improvement. • Herbicides and pesticides are still widely used as no practical and effective alternative has, as yet, been identified. The incorrect application of these chemicals leads to habitat destruction and the presence of untreatable chemicals in drinking water supplies. • Lack of resources to enforce and implement existing environmental regulations/legislation to protect water resources. • A lack of joined up thinking in terms of enhancing ecosystems services and

enthusiasm by Group Water Schemes and land owners farming in some drinking water catchments. • Mandatory pesticide training course educates users on correct spray application.	supports for same.
Opportunities • There is significant merit in the creation of an agri–environmental scheme that is results based and offers farmers a payment for adhering to certain practises, such as not spraying/spreading slurry in the Zone of Contribution/Source protection area of a drinking water source along with incentives to put mitigation measures in place (Similar to BRIDE project) • Further education is required on the correct application of sprays. • Encouragement of community groups to engage with initiatives such as 'no mow May' with the backing of local government. • Foster a greater understanding of the identification and treatment of invasive species nationally. • Similar to the NFGWS 'All About Water' primary schools' education programme, a curriculum with an emphasis on water quality, biodiversity and climate change, should be introduced as part of the national curriculum. • Changing consumer preferences on how their food is produced could be a market opportunity for farmers, with an emphasis on 'green' production. • There is an opportunity to greatly improve the control and use of pesticides. Significant work has been done to improve the situation at farm level but there are emerging issues at domestic level that also need to be addressed.	Threats • The loss of pollinators will result in many crops being unable to grow • Increasing population could result in more pressure being placed on fragile eco-systems. • Reliance on public engagement. • Crop and animal disease associated with Climate change pressures • Changing climatic conditions could not only lead to an increase in currently present invasive species but could also see the introduction of new invasive species.