

SWMI Consultation
Water Advisory Unit
Department of Housing, Planning and Local Government
Custom House
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rbmp@housing.gov.ie

7th August 2020

Re: Significant Water Management Issues in Ireland

To whom it may concern,

The Irish Co-operative Organisation Society (ICOS) is pleased to contribute to this important public consultation on water quality management in Ireland.

ICOS is the umbrella body for over 130 co-operatives in Ireland – including the Irish dairy processing & milk purchasing co-operatives and livestock marts – whose associated businesses have a combined turnover in the region of €14 billion, with some 150,000 individual members, employing 12,000 people in Ireland, and a further 24,000 people overseas.

The ICOS submission will focus on the three questions related to the agriculture chapter in the public consultation document “Significant Water Management Issues in Ireland”.

How can the agricultural sector contribute towards improving water quality?

The Irish agri-food sector is responsible for annual exports worth over €14.5 billion, with dairy sector exports valued at €4.4 billion and livestock exports valued at €3.9 billion. The agri-food sector is Ireland’s largest indigenous industry responsible for the creation of sustainable jobs and employment across the rural economy. As integral members of Ireland’s export led economy, ICOS members are acutely aware of the importance of sustainability and the challenges that face the sector. Our members are founders of Origin Green, Bord Bia’s pioneering food and drink sustainability programme. Our members are food processors, operating in extremely competitive global markets with international customers increasingly focused on sustainability, in addition to ensuring the highest quality and safety standards. Ireland has successfully built a reputation for a producer of sustainably produced dairy and meat production. The agri-food sector has a vested interest to ensure Ireland’s water quality is improved to the highest possible standard. We believe that it is in everyone’s interest to work together to improve Ireland’s water quality and the dairy sector in particular is committed to working closely with farmers and with Government in a collaborative manner to protect water quality and our reputation as sustainable and safe producers of high-quality food.

ICOS members are key stakeholders and funders of the Agricultural Sustainability Support and Advisory Programme (ASSAP). ICOS as a representative body participates at the Farmer Consultative Group of ASSAP chaired by Teagasc. The ASSAP programme is an important new approach that

enables farmers to engage positively in seeking solutions to local water quality issues with the support of a confidential advisory service. The main dairy processing co-ops have employed an ASSAP advisor to compliment the scientific work carried out by the LAWPRO team. The co-op ASSAP advisor provides a free, confidential and voluntary advisory service to farmers in the Priority Areas of Action. The co-op ASSAP advisors provide farm specific assessments and plans to prevent the loss of nutrients and sediment from entering waters. The co-op ASSAP advisors also play a key role in disseminating key water quality messages to their wider member suppliers through farmer meetings, newsletters, text messages, social media platforms, videos and webinars.

The dairy processing co-ops also run joint programmes with Teagasc, with some in operation for more than 20 years. The joint programmes are farm development programmes, which seeks to address technical improvement, with environmental stewardship now central pillars of each programme. The co-ops also run a series of pilot farms under the dairy sustainability initiative to demonstrate best practice to their suppliers in the area of soil health, soil pH, nutrient management, farmyard management, slurry management and application.

These are practical examples of measures the agriculture sector and the co-op sector in particular are contributing to better water quality. The co-op sector as businesses owned and controlled by farmer members have demonstrated a strong commitment to their supplier base by supporting a range of technical programmes including ASSAP. This commitment will continue into the future across all aspects of environmental sustainability including water quality. We emphasise the importance of addressing issues such as water quality in a collaborative, whole of government and whole of sector approach. This method will deliver greater environmental outcomes, while sustaining economic activity in rural Ireland.

Do you believe that CAP will have a positive or negative impact on water quality in Ireland?

The Common Agricultural Policy (CAP) has played a positive role in improving water quality in Ireland. The European Commission's evaluation of the CAP's impact on water quality published in 2019 concluded that the CAP has participated in raising awareness on water issues and put the topic of water higher on the agenda.

In Ireland, the CAP has supported improved water quality through environmental and investment programmes under rural development measures. The Green Low Carbon Agri-Environment Scheme (GLAS) is a targeted agri-environment scheme under the Rural Development Programme. Prioritisation of farms within vulnerable catchments and 'high-status' waterbodies is a key feature with 45% of GLAS actions benefiting water quality.

The Targeted Agricultural Modernisation Scheme and its predecessors has been instrumental in supporting on-farm investment in new slurry storage, farm buildings and novel machinery such as trailing shoe technology. Specifically, there are two TAMS schemes benefiting the protection of water: The Animal Welfare, Safety and Nutrient Storage Scheme and the Low Emission Slurry Spreading Scheme. These investment schemes have undoubtedly contributed to improved environmental and water quality outcomes. The continuation of a well-funded TAMS programme under the next financial period from 2021-2027 is critically important to ensure continued improvement and outcomes at farm level.

In addition, the cross-compliance framework includes statutory requirements related to water protection and management arising from the implementation of the groundwater directive and nitrates directive, as well as GAEC standards.

The CAP Reform process for the period 2021-2027 is still under negotiation with at least a two-year transition period envisaged. However, it is evident that the new CAP framework will result in an even greater emphasis on the environment. Under Pillar 1 of the new CAP, Member States will have to design eco-schemes, which is a new requirement. The development of eco-schemes should operate in conjunction and compliment new agri-environmental and investment schemes under Pillar 2.

We emphasise the importance of developing a new environmental scheme under Pillar 2 that will encourage greater participation by dairy farmers with a focus on measures that will have co-benefits for climate, water, soil and air. We also emphasise that the CAP cannot do everything. The CAP provides vital income support to thousands of farm families, underpinning food security and the provision of positive public goods. However, the CAP is one of the most important tools to bring targeted change. A good environmental scheme, supplemented by practical, well designed, farmer friendly eco-schemes will be important.

Finally, the new CAP must continue to support productivity and efficiency at farm level. Ireland's grass based, sustainable production system is key to our efficiency and low-cost production. The TAMS programme is key to supporting farm investment, environmental improvement, animal welfare and health & safety and must be continued under the new CAP.

Do you think CAP measures to protect water quality should be retained at a national scale or become more locally targeted?

The best approach will involve national measures combined with locally targeted measures. The Agricultural Catchments Programme (ACP) has a cumulative 10 years of water quality monitoring set up to assess compliance with the nitrate's directive. The ACP involves 320 farmers across 6 catchments. Each catchment has different soil and farm types with P loss a greater issue on heavy clay soils and N loss a greater issue on free draining soils. N & P contrast significantly with mitigation measures different as a consequence. In summary, soil type, weather and farm practice will all have a bearing on water quality so the more targeted the measure can be, the better the likely outcome.

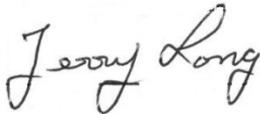
The ASSAP programme is an example of a locally targeted approach, with individual farm assessments carried out under three categories: land management, nutrient management and farmyard management. The ASSAP programme through scientific work conducted by LAWPRO has identified the main pressures on water quality in each PAA. This information can be used as a basis for preparing mitigation plans for farmers designed to help improve water quality. The scientific work conducted by LAWPRO has concluded that sediment loss is a greater pressure on water quality than previously considered, which is an important learning.

The combined approach between national and locally targeted measures could be provided for under the new CAP eco-schemes, with ICOS proposing that farmers should be provided a menu of options with mitigation measures appropriate depending on the water quality pressure at local level, whether it's P, N or sediment. This is the approach we have supported at the CAP consultative committee established by the Department of Agriculture, Food and the Marine.

The ASSAP programme has identified a range of mitigation options with the ASSAP Interim Report published in 2020 highlighting 20 mitigation actions for farmers including preventing P loss through overland flow, NMP planning, buffers, drinking & stream fencing, organic manure location and method etc. These options are discussed with the farmer and appropriate action is selected. These 20 mitigation measures should be examined including barriers to their adoption. The CAP should provide appropriate support to farmers involved in implementing these mitigation measures, especially measures where cost is a barrier.

We look forward to engaging constructively and positively with both the Department of Housing, Planning and Local Government and the Department of Agriculture, Food and the Marine on the important issue of water quality. We re-emphasise that it is in everyone's interest to work together to improve Ireland's water quality. The dairy sector is committed to working closely with farmers and with Government in a collaborative manner to protect water quality and our image as sustainable and safe producers of high-quality food.

Yours sincerely,

A handwritten signature in cursive script that reads "Jerry Long". The signature is written in black ink on a white background.

Jerry Long
President