

2<sup>nd</sup> March 2021

**ICOS Response to EU Commission Public Consultation -Evaluation of the Sewage Sludge Directive  
86/278/EEC**

ICOS is the umbrella body for over 130 co-operatives in Ireland – including the Irish dairy processing and milk purchasing co-operatives, livestock marts and other rural based enterprises, such as breed societies, animal health and AI societies – 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.

We welcome this opportunity to provide feedback on the European Commission Public Consultation Evaluating the Sewage Sludge Directive. ICOS fully recognises the need for modern and long-term strategy for the management and utilisation where possible for wastewater sludge, however wishes to highlight our opposition to the use or the promotion of the use of municipal sludge on agricultural land for food production in Ireland, for the following reasons:

- 1. We believe the promotion of the use of municipal sludge on agricultural land for food production to be inconsistent with environmental and well as food safety and quality strategies in place for the agri-food sector in Ireland.**

Specifically, the Sustainable Dairy Assurance Scheme (SDAS), the nationwide, audited quality and sustainability programme for the dairy farms, in operation under Bord Bia's Origin Green, prohibits the use of raw or treated sewage sludge on certified farms. This is considered a mandatory and critical auditable requirement of the scheme.

ICOS also points out that the Food Safety Authority of Ireland in 2008 published a report<sup>1</sup> outlining that the spreading of organic materials on land used for food production may pose both microbiological and chemical risks to food safety. Furthermore, it was noted that the use of municipal sludge poses broader environmental risks to both water and soil quality.

- 2. We believe that consumers of Irish agri-food products will not tolerate the production of dairy products from lands spread with municipal sludge.**

Irish agri-food cooperatives are operating in an extremely challenging market environment. Our reputation as a producer of the highest quality assured dairy products is essential to difference ourselves and provide added value to products by positioning them in the upper end of the marketplace. We do not support the promotion of any activity on Irish farms which would jeopardise this.

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<sup>1</sup> FSAI, 2008: <https://www.fsai.ie/WorkArea/DownloadAsset.aspx?id=8226>