

River Basin Management Plan Consultation  
Water and Marine Advisory Unit  
Department of Housing, Planning, Community and Local Government  
Custom House  
Dublin 1

31<sup>st</sup> August 2017

**Re: ICOS Submission to the River Basin Management Plan Consultation 2018 to 2021**

To whom it may concern,

The Irish Co-operative Organisation Society (ICOS) welcomes this opportunity to outline its views on the draft river basin management plan 2018-2021.

ICOS is a co-operative umbrella organisation that represents, serves and promotes the interests of commercial co-operative businesses across multiple sectors of the Irish economy including the agri food sector. ICOS represents 130 co-operative societies that collectively have over 150,000 individual members, with a combined turnover of €14 billion and employ more than 12,000 people in Ireland. The majority of Irish dairy businesses are multi-purpose co-operatives with interests in milk processing, liquid milk, consumer foods, agri-trading and feed milling. There are 11 milk processing and 13 milk purchasing co-operatives located across rural Ireland. Irish dairy products are exported to 155 countries worldwide, valued at €3.38 billion in 2016. ICOS also represents over 60 livestock mart co-operatives and a range of societies including community and rural based enterprises and services.

ICOS welcomes the development of the second cycle of the river basin management plan for the period 2018-2021. We fully support the overall approach as outlined in the draft plan to water management and water quality improvement to achieve the objectives of the Water Framework Directive. As representatives of dairy co-operatives, we fully acknowledge our responsibility to develop in the post quota era in a manner that further protects the environment and fully adheres to the principle of sustainable intensification as outlined in the Food Wise 2025 Strategy.

The draft plan outlines a long term approach, which is needed to ensure gradual and consistent improvements in water quality. This approach will also capitalise on the positive measures contained in the first river basin management plan from 2009-2015 such as the agricultural catchments programme.

The agricultural catchments programme involves 6 catchments, with the voluntary participation of 300 farms. The programme has resulted in enhancements in water quality due to improved farm management practices. Additionally, the catchments programme has proven to be an invaluable source of information on best practice.

ICOS strongly welcomes the recognition provided in the draft plan to the development of the National Sustainability Dairy Forum. This is a very positive example of a unique joint industry, farmer and government approach to water quality management. The National Sustainability Dairy Forum

will include in its initial phase six co-operative led pilot projects to improve nutrient management planning and on farm source pollution.

ICOS is a partner member of the National Sustainability Dairy Forum, which includes a cross section of industry and regulatory stakeholders. A collaborative approach such as the National Sustainability Dairy Forum will ensure that the appropriate actions are undertaken to improve water quality levels.

The strong emphasis on knowledge transfer and the adoption of best practice contained in the draft plan is also welcome. As identified in the draft plan, the knowledge transfer programme funded by the Rural Development Programme (RDP) will aim to engage with up to 27,000 farmers over the period 2017 to 2021. This will be supported by the roll out of the on-line nutrient management planning system to all farmers.

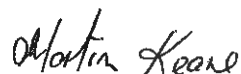
Further measures aimed at enhancing water quality levels are contained under the agri-environment schemes contained under the RDP such as grant aid for low emission slurry spreading equipment under the Targeted Agricultural Modernisation Scheme (TAMS II) and measures to enhance and protect water quality under the Green Low Carbon Agri Environment Scheme (GLAS).

It is also important to recognise that there are clear linkages and relationships between mitigation measures in the area of water quality and measures to address broader sustainability challenges such as climate change and air quality levels. The adoption of these measures need to be fully maximised in the context of an expanding dairy sector following the abolition of milk quotas.

Finally, ICOS recognises that the Nitrates Directive is an important legislative measure that contributes to the achievement of good water quality. There are 6,800 farmers under a derogation, which is applied for annually and is granted under strict conditions, including inspections, soil sampling and analysis, the provision of a fertilisation plan and the provision of fertiliser accounts. ICOS strongly believes that the continuation of Ireland's derogation under the Nitrates Directive without further conditionality is justified based on the sustainability credentials of Ireland's grass based production system. Further, the National Sustainability Dairy Forum is an important new initiative designed to underpin and demonstrate the sustainability of Irish agriculture.

ICOS reiterates its support for the draft plan and looks forward to engaging further with the Department of Housing, Planning, Community and Local Government, together with the Department of Agriculture on water management and water quality improvement in the area of agriculture.

Yours sincerely,



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Martin Keane  
President