
SUBMISSION ON

DRAFT FOURTH NITRATES ACTION PLAN

NOVEMBER 2017

Introduction

An Fóram Uisce (the Water Forum) was launched in April 2017. With the forthcoming enactment of the Water Services Bill 2017, An Fóram will be the only statutory body representative of all stakeholders with an interest in the quality of Ireland’s water bodies. An Fóram consists of 30 members including representatives from a wide range of organisations with direct connections to issues relating to water quality and also public water consumers. Approximately 50 different organisations were involved in the nomination of members.

In representing the various stakeholders, An Fóram has commenced engaging with the agencies and departments who have responsibilities under the Draft River Basin Management Plan for Ireland (2018 – 2021) as well as the wider water community. This will result in improved understandings and enable the emergence of a common policy platform on particular catchment management issues and on the overall area of water services-drinking water and waste water treatment.

Overview of the Draft Fourth Nitrates Action Plan

An Fóram notes that the process of drafting the NAP commenced earlier this year, prior to its establishment and as such, An Fóram did not have the opportunity to engage in that process. The current consultation phase is based on a very limiting timeframe and therefore An Fóram was not in a position to carry out full engagement with its members in relation to its submission.

That being said, An Fóram notes that there appears to have been a reasonable level of consultation in the process to date and also that a number of its constituent stakeholders have made their own submissions during the earlier consultation phase.

In its considerations since establishment, the members of An Fóram have expressed their serious concerns at the vulnerability of our water resources; with the challenge of addressing the poor quality of a major proportion of Ireland’s water bodies and with the need in a general sense to reconcile the economic needs and aspirations of Irish society with the needs of maintaining a high quality aquatic environment.

Having regard to these concerns, An Fóram generally welcomes any plan or programme which is designed to assist or encourage best practice or, to eliminate or mitigate bad practice, in the context of environmental management.

An Fóram is mindful of the requirements contained in the Draft River Basin Management Plan for Ireland (2018 – 2021) and requires that same are respected and provided for in all ensuing Plans and Regulations so as to ensure the realisation of the commitments in that Plan.

The Draft RBMP states that primary agricultural production is a *'key source of rural diffuse and point source pollution. The catchment characterisation process found agriculture to be a significant pressure in approximately 67% of 'at risk' water bodies'*. The Plan also states that *'excess nutrients, chemicals such as pesticides as well as sediment loss due to poor land management have all been identified as likely pressures in certain water bodies'*. (pg 50)

It is clear that phosphates and nitrates present significant challenges to the aquatic environment and that the agriculture sector is a heavy user of both. There appears to be three over-riding factors in the management of nitrates and phosphates in agriculture. There are the N and P load, the hydro-morphology of the soil and the quality of farm management. These three factors will combine and interact in different ways on each individual farm. Bearing in mind the individual localised nature of any potential loss of N and P to watercourses, it is absolutely essential that detailed monitoring at farm level accompanies the roll out of these measures.

An Fóram would have welcomed a stronger focus in the Plan on the circular economy and in particular how N and P produced as animal waste could be recovered and used as a replacement for chemical fertilisers. This would have economic benefits for farming; incentivise farmers to take measures to prevent N and P loss; contribute to meeting Ireland's renewable energy and climate change objectives and take cognisance of the fact that phosphates, in particular, are a finite resource which need to be used and re-used in an optimal manner.

An Fóram notes the measures referred to in the NAP which are designed to assist in the protection of water sources as part of catchment management initiatives. These measures include focusing on intercepting and breaking nutrient transport pathways and preventing sediment and nutrient losses to waters. The measures proposed in relation to the exclusion of bovines from watercourses; measures associated with pig farming; timing of spreading; farmyard management and knowledge transfer programmes; distances from water courses; crop requirements and soil analysis are all important. It further notes that the effective date for some of these measures as the 1st January 2021 and would encourage the introduction of schemes (e.g. the re-introduction of GLAS) at the earliest possible date which would support an earlier implementation of these measures.

The overriding governing principle of the Draft RBMP is 'the right measure in the right place'. An Fóram would need assurance that the mitigation strategies proposed in the Plan do in fact amount to the right measure in the right place.

Conclusion

An Fóram Uisce notes the provision of the Nitrates Action Plan and understands the challenges of the Agricultural Sector in implementing Food Wise 2025 whilst ensuring the protection of the environment on which its success or otherwise is deeply rooted. We note the growing realisation within the farming community of the inextricable relationship between a clean environment and a progressive food sector. This is evidenced by significant new initiatives within farming e.g. the dairy sustainable initiative and the smart farming initiative. It is further noted that the pressures of maintaining quality food access to economically stretched consumers must also be a consideration in our decision making.

Given the confluence between the economic and environmental objectives, An Fóram considers that the NAP requires strengthening in relation to the early implementation of protection measures and also with regard to the requirements in terms of monitoring and reporting, having regard to the deadlines provided for in the Water Framework Directive. Now that the priority action areas described in the Draft RBMP have been identified and additional resources are being provided to assist in providing further and more detailed analysis, it should be possible to identify the appropriate and specific measures to be taken at farm level to prevent any further deterioration in water quality and indeed to assist in improvement in water quality.

An Fóram hopes that its views will be of assistance in finalising the Nitrates Action Plan. Having regard to its status in the context of the Water Framework Directive, An Fóram is requesting that consideration be given to facilitating a greater level of engagement with it in relation to the implementation and monitoring of the Plan and wishes to advise that it is available for this purpose on an on-going basis.

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Please address any correspondence as follows:

*Sharon Kennedy
Senior Executive Officer
An Fóram Uisce
Civic Offices
Limerick Road
Nenagh
County Tipperary
087 4194547*