



# National Federation of Group Water Schemes

Society Limited

24 Old Cross Square, Monaghan H18 NX30

Tel: 047 72766 Fax: 047 72788 Website: [www.nfgws.ie](http://www.nfgws.ie)

23<sup>rd</sup> May 2019

## **NFGWS Submission to Department of Agriculture Food and the Marine on the Nitrates Derogation Review 2019**

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.

The NFGWS welcomes the opportunity to participate in this consultation process. Since its formation, the NFGWS has been working with farmers across the country to protect and improve water quality in GWS drinking water catchments. In recent years, we have been actively implementing phase I of a source protection strategy. This has focused on the identification and mapping of drinking water source catchments. This phase has been substantially completed for all regulated<sup>1</sup> group water scheme supplies with their own source. In 2018 we established a source protection pilot project phase II, which is now underway.

The NFGWS recognises the vital role that the farming community has played in the development and promotion of the group water scheme model over the years. We equally recognise the impact that agricultural practices can have on drinking water quality. We strongly believe that the GWS sector can play a significant role in mobilising communities, including farmers, to adopt practices to enhance water quality. An objective of this review should be to ensure that any decision on derogation does not negatively impact on water quality. Should measures (other than statutory obligations) be required to protect drinking water sources, in particular, associated programmes of support should be introduced to ensure that farmers do not suffer any financial loss.

The questions outlined in Appendix 1 of the consultation paper are quite specific and targeted. We do not possess sufficient scientific and technical information to answer them specifically, however we have the following responses.

**1. Our livestock systems are based on the maximum utilisation of grassland. How can we increase the efficiency of grassland management on derogation farms, while protecting the environment?**

Balancing intensive agricultural production with water protection is extremely difficult. With notable exceptions, most countries have failed to achieve this balance, to the detriment of water quality and the wider environment. It is imperative that Ireland does not follow suit. In addition, given the global challenges in terms of climate change, biodiversity loss and wider environmental pressures, alternatives to further intensification should be considered that do not impact on farming income. The recent announcement of a climate and biodiversity emergency in Ireland will have to be addressed by every sector and there is an opportunity to do so as part of this review process.

While it is understood that a grass-based system will continue as the basis of Irish Agriculture for the foreseeable future, there is a need to introduce new Agri-environmental schemes that

---

<sup>1</sup> GWS monitored under the Drinking Water Regulations 2017

incentivise and support farmers for farming less intensively. Certainly, there is a need to improve efficiency and practices on land that is capable of supporting intensive farming, such as improved grassland management, grass types used, use of clover swards, animal breeding etc., but there is also a need to recognise that in particular parts of this country, poorly drained soils pose a significant risk to drinking water sources in terms of nutrient loss to water supplies. Similarly, in other areas, many free draining soils pose a particular challenge in terms of nitrate leaching to groundwater sources. There needs to be recognition that not all soils are suitable for increased production. Farmers working on these types of soils should be supported to remain less intensive in order to protect our drinking water sources while also offering opportunities to combat climate change and support biodiversity. New incentivisation schemes are needed that provide significant financial recognition to farmers willing to farm less intensively in these areas. In parallel, derogation farming might be supported on land that is capable of sustaining intensification based on the best available science. From the initial learnings of our source protection pilot projects, a 'one size fits all' approach to intensive agriculture is not sustainable.

As part of our source protection pilot project, we are working with farmers to increase riparian zones beyond the GAP regulations. However, if this is to succeed, support for the landowner is required.

The successful SMART farming initiative is a positive example of how the farming sector can adopt and implement a strategy of change by promoting key messages to the farming community. Consideration should be given to the further expansion of the SMART farming initiative to include environmental measures such as those mentioned above.

## **2. How can livestock manure be best managed to ensure its impact on the environment is minimised?**

Livestock manure applied to land poses a risk to drinking water supplies especially on unsuitable soils. The detection of gross levels of E coli and the presence of cryptosporidium in drinking water sources - as well as nutrient loading of surface water sources – is a concern. The delineation of drinking water catchment areas and Zones of Contribution has now been completed and these provide a valuable source of information. Efforts should be made to share this information with farmers so that they are aware of the potential threat to public health if there are pathways along which manures may migrate to drinking water sources (drains etc.). This should be supported through a series of educational and promotional programmes targeting both derogation and non-derogation farmers in drinking water catchments.

The potential to use organic manures to recover energy through anaerobic digestion and other emerging technologies must also be considered. The potential to use slurry or manure to recover and generate power for local communities should be incentivised and encouraged. While the methane from such manures can generate a source of energy, the nutrient value of the by-product is still available for land spreading. Many rural areas of Ireland have heavy soils that are not capable of taking up nutrients effectively or quickly enough. To ensure that these nutrients are not lost, an incentivised scheme to transport slurry or manure off-farm including to land more suitable to intensive farming should be considered. This is already the practice in areas of intensive poultry production.

We understand that advances in the scientific understanding of soils and communications provide a valuable resource for farmers (e.g. soil sampling and the use of soil P susceptibility maps etc.). The extensive gathering of further useful information at field scale level will

support best practice. The use of Nutrient Management Plans should be encouraged on all farms, not just derogation farms.

**3. How should agricultural impact on soil be minimised on derogation farms?**

Measures to promote eco till, cash crops and other approaches to reduce carbon loss to the wider environment from bare soil and traditional tiling methods should be considered.

Similarly, measures to reduce soil compaction (which can result in preferential surface water flows) and improving soil structure should be promoted.

There is evidence that the application of lime to certain soil types would improve nutrient uptake in plants following landspreading. Liming of lands, where necessary, should be mandatory.

**4. What specific actions can derogation farms take to minimise their impact on the environment?**

As part of the development of source protection plans, Critical Source Areas (CSA) within a drinking water catchment are being identified (if any). Farmers, derogation or otherwise, within these areas are working with communities to implement specific measures and actions (depending on the pressure) to improve and/or protect the drinking water supply. Many of these actions may go beyond the current regulations in place. In such instances these should be supported.

Soil sampling on a field scale should be promoted and encouraged to ensure that farmers have the knowledge to make the right decisions in relation nutrient management.

**5. Should all intensive livestock farms be subject to the conditions of the derogation whether they apply or not?**

Non-derogation farmers farming within CSAs of drinking water catchments should be advised and supported to implement measures that currently apply only to derogation farmers. There should be no distinction between the two categories.

It may be necessary for Agri-environmental programmes aimed at environmental protection to be enhanced to encourage livestock farmers on poorly draining soils (and on freely draining soils where water quality issues have been identified) to farm sustainably.

We hope the comments and suggestions contained in this submission will be positively considered as part of this review process. Should you require any clarification or further information, please contact me.

**Barry Deane**  
**CEO NFGWS**