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RE: Irish Water Submission on Agri-Food Strategy 2025

To whom it may concern,

Irish Water welcomes the consultation process under way on Agri-food Strategy 2025, it is particularly timely, as Irish Water itself embarks on public consultation on our Water Services Strategic Plan (25 year plan) in February 2015, and as Bord Bia plans to publish its Origin Green Sustainability Report in mid 2015.

In its review of Food Harvest 2020, the Department of Agriculture, Food and the Marine correctly identified the central challenges in sustainable living, and said that:

"the more rigorous (environmental) obligations will require a more cohesive governmental approach to tackle the global challenges of climate change and food, energy and water security."

A 'cohesive governmental approach' challenges us all to view the landscape of effective action from the correct national perspective, and to reach considered priorities together.

Irish Water seeks to support national policy objectives including those relating to Irish agriculture (Food Harvest 2020), noting that sustainability requires us to work together, to reach a balance between the pressures of productive farming, and influences that affect water including pathways for pollution, impacts from pathogens and pesticides and sedimentation of watercourses. Our objective is to provide world class water to process world class food, recognising the unique capacity of this country to do both, when we manage these key resources together.

We hope that the Department of Agriculture Food and the Marine (DAFM) will take the opportunity in the Spring to underline the value of wholesome water supplies, sustainably sourced and protected, allied with world class food production, and with complementary wastewater treatment capacity. The establishment of Irish Water allows us to shape the synergies between these two important components of 'brand Ireland', working together.

The challenges of intensification

In 2010 the dairy industry set itself the ambitious target, under the earlier Food Harvest 2020 strategy, of increasing milk production by 50% by 2020. This was to be achieved by increasing the 2008/2009 average annual milk production of 5bn litres to 7.5bn litres in 2020. Imminent lifting of milk quota in Q2 of 2015 has already been driving investment planning in the sector. We are aware that Enterprise Ireland have been working closely with milk processors, and the demographics of milk production and processing, and consolidation in both, are strategic planning factors for DAFM. At present, 18,000 milk producers, working through 90 purchasers, deliver to a small number of processors (82% of our milk is processed by the top 6 dairy co-operatives). The top third of producers, account for 60% of the milk produced. Increasing milk production by 50% in seven years, and the profile of the intensified production and processing centres, requires close planning between DAFM, the EPA, and Irish Water, on both water supplies and wastewater treatment, and in the management of organic wastes.

The discussion papers published on the DAFM website highlight the productivity of Irish grassland, and they have identified sustainable food production as a particular point of differentiation within Irish agriculture. Our collective approach to ensure compliance with best practice on environmental protection will protect water resources and this in turn will support the global marketing of our food.

The discussion papers have focused, quite rightly, on compliance with the Water Framework Directive in the aquatic environment.

Irish Water warmly welcomes the Origin Green Programme of sustainable farming, and we emphasise the closed nature of the loop between catchment nutrient management, protection of water bodies, their sustainability as sources for water abstraction and treatment, and in turn the delivery of wholesome water supplies to communities, industry, and to the centres of agri-food production themselves.

Irish Water will be expected by its customers to vigilantly avoid the burden of increased water and waste water treatment costs that would arise, if the necessary mitigation measures, needed to address the increased agricultural pressures on water were not implemented. The national cost of fixing failure will far exceed the investment we agree we need to get it right.

The planned level of intensification challenges us all to talk to one another, to plan well together, and to take the earliest, collective measures of greatest value in environmental protection.

The right perspective

There are opportunities in the centralised treatment of organic wastes, for energy recovery, with methane biogas generation for energy recovery, with beneficial impact on greenhouse gases and carbon footprint. There may be synergies between Irish Water and the agricultural sector in centralised treatment and energy recovery from organic wastes. We wish to engage with the agriculture sector to retain sustainable safe outlets for sludge biosolids re-use in Irish Agriculture. Irish Water are currently developing a National Wastewater Sludge Management Plan which is due to be complete in 2015. This plan will study the options for sustainable reuse of wastewater sludges. This will be based on effective pasteurisation of all sludge in accordance with the Code of Good

Practice for Use of Biosolids in Agriculture including energy recovery where feasible. We are committed to ensuring that the Code of Good Practice for Use of Biosolids in Agriculture and all relevant legislation is complied with and that we have full traceability of wastewater sludge from our plants to the final destination for beneficial reuse of biosolids.

We recognise that prosperous farming is the anchor of balanced regional development in Ireland, and it is the basis of our global reputation for safe, wonderful food. We believe that it is consistent with this objective that we have a similar high quality water supply and wastewater service, managed in a sustainable way, to support socio-economic development, including agri-food production.

Yours sincerely,


Gerry Galvin
Chief Technical Advisor

