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Re: Scoping Report for the Environmental Assessment of Ireland's CAP Strategic Plan 2023-2027

To whomit may concern

Irish Water welcomesthe opportunity to make a submission on the Scoping Report for the Environmental Assessment of Irelands CAP Strategic Plan 2023-2027.

Irish Water provides treated drinking water to over 80% of the population and distributes over 1.7billion litres of water from 918 water treatment plants (WTPs) every day. We abstract raw water from approximately 290 surface water catchments and 960 groundwater catchments. When combined these drinking watercatchments cover approximately 50% of the land area of Ireland. The landuse within these catchments covers a variety of types including agriculture, peatlands, forestry, and urban areas. Howthe land is managed has the potential to influence raw waterquality and can present treatment challenges at our WTPs. Irish Water is commtited to working with public bodies and other stakeholders towards a common goal of the protection of drinking water sources.

The protection of drinking water sources should be afforded special consideration and status in the interest of the protection of public health; in recogntiion of the seriousness and severity of the potential consequences of consumption of contaminated drinking water. Protecting and restoring the quality of raw water is an effective and sustainable means of reducing the cost of water treatment in line with Article 7(3) of the Water Framework Directive. The agricultural sector has huge potential, and capabiltiy, for implementing measures and interventions, which can deliver multiple benefits; including for water quality, human health, sustainability, biodiversity, climate change mitigation and adaptation, and flood mitigation.

Irish Water's Water Services Strategic Plan (WSSP) was published in October 2015 and sets out strategic objectives for the delivery of water services over a 25 year

timeframe to 2040. One of the strategic objectives for Irish Water outlined in the WSSP is to ensure a safe and reliable water supply. Irish Water activities that contribute to improving the resilience of drinking water supplies and the safe use of bio-solids include:

- The National Water Resources Plan (which seeks to address issues around the availability of water);
- Drinking Water Safety Plans (which address issues around the quality of water); and
- National Wastewater Sludge Management Plan.

National Water Resource Plan (NWRP)

Irish Water is preparing a National Water Resources Plan which is a 25 year strategic plan for the entire public water supply. The plan is being delivered in two stages. Stage 1 (National Water Resources Plan Framework) sets out the methodology used to assess need across the public water supply in terms of quality, quantity, reliability and sustainability, and will also summarise 'identified need' on a national basis. It was published in December 2020 and can be viewed here: https://www.water.ie/projects-plans/our-plans/nwrp/.

Stage 2 will involve the development of four regional water resources plans which will identify plan-level approaches to address the identified need in a sustainable manner. The approaches are focused on both the supply and demand aspects of public water supply and can be summarised as:

- Use Less – water conservation measures;
- Lose Less – leakage reduction and network efficiency;
- Supply smarter – sustainable supplies (including options for conjunctive use).

The regional plans align with the requirement to support balanced regional development, and will include for inter-region or inter-catchment water supplies, where required, to ensure adequate water provision into the future. There will be a focus on efficient, environmentally sustainable water use; and on providing for reliability and security of supply (i.e. system resilience). It is proposed that the water resource planning process incorporates all information on significant pressures in relation to abstractions, as it becomes available, in order to ensure alignment with the requirements of the third cycle RBMP.

Drinking Water Safety Plans (DWSPs)

Irish Water has adopted the World Health Organisation (WHO) Water Safety Plan approach. Drinking Water Safety Plans (DWSPs) seek to protect human health by identifying, scoring and managing risks to water quality and quantity; taking a holistic approach from source to tap. The 'source' component of DWSPs is a key component and a priority within Irish Water, as protecting and restoring the quality of raw water is an effective and sustainable means of reducing the cost of water treatment in line with Article 7(3) of the WFD. The DWSP source risk assessments undertaken to date indicates that the most common issues in relation to raw water quality in Irish catchments include cryptosporidium, sediment, colour, ammonia and pesticides. The following 'hazardous events' (or risks) identified in DWSP that relate to activities within the catchment are set out below:

- Agricultural activities causing biological contamination;
- Agricultural activities causing chemical (dangerous substances) contamination;
- Agricultural activities causing nitrates/phosphates contamination;
- Livestock accessing groundwater well head area causing biological contamination (and elevated sediment levels); and,
- Livestock accessing the vicinity of the surface water/spring intake causing biological contamination (and elevated sediment levels).

National Wastewater Sludge Management Plan

Irish Water currently produces approximately 59,000 tonnes of biosolids (treated dry solids) per annum. These biosolids are currently re-used in agriculture in accordance with the GAP Regulations. In accordance with Irish Water's National Wastewater Sludge Management Plan, published in 2016, the preferred option for re-use of biosolids is reuse on land, with non-food tillage crops and energy crops being the primary focus.

Irish Water Recommendation's for Scoping Report

To afford the protection of drinking water sources, Irish Water would like to make to following suggestions for inclusion in the scoping report:

- Under section 2.5.1 "International" mention the recast of the Drinking Water Directive (DWD) 2020. In Appendix A mention the importance of drinking

water source protection in terms of managing the risk of agricultural activities in the catchments for drinking water sources.

- In the Table 2 “Strategic Environmental Assessment Topics – scoping and potential significant environmental effects” we would consider that herbicide and pesticide use has the potential to have a negative effect.

- In the Table 4 “Datasets for the SEA Environmental Report” drinking water abstraction catchment boundaries should be included and WFD drinking water protected areas. The draft drinking water abstraction catchment boundaries can be obtained by sending a request to Datarequests@water.ie.

- In the Table 5 “Draft Strategic Environmental Objectives and subheadings” a sub-objective under Water Resources should be included:

    - "*Protect and improve drinking water sources as required under the Water Framework Directive and recast Drinking Water Directive.*"

- Figure 6 presents a preliminary environmental sensitivity map. We would suggest that Water Framework Directive Drinking water protected areas should be included.

- In Appendix A, note that the National Water Resources Plan Stage 1 framework has been published. For the Water Services Strategic Plan 2015 the objectives relating to drinking water source protection should be included "*Manage the sustainability and quality of drinking water from source to tap to protect human health.*"

Irish Water welcomes further discussions and looks forward to working collaboratively with all stakeholders to support drinking water source protection.

Yours sincerely,

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