

Sustainable Water Network (SWAN)

Response to Public Consultation on draft CAP Strategic Plan 2023-2027

December 2021

SWAN welcomes the opportunity to make a brief submission on the consultation on the CAP Strategic Plan. In light of:

- the well documented impacts of agriculture on the Irish water environment
- the fact that agriculture is primary 'significant water management issue' and pressure preventing Ireland reaching our mandatory Water Framework Directive (WFD) objectives and
- The deadline for reaching our WFD targets co-incides with the end of this CAP Strategic Plan period

we make the following recommendations:

PILLAR I, ECOSCHEMES

1. Any ecoscheme for fertiliser reduction should be specifically tailored to high N catchments, as identified by the EPA publication '[Assessment of the catchments that need reductions in nitrogen concentrations to achieve water quality objectives](#)' which catalogued the reductions necessary in order to comply with WFD requirements and shows that significant reductions in nitrate leaching are necessary for the majority of the problem catchments in 2019 (reductions of over 50% in some cases).
2. Targets for nitrate reduction should at a minimum align with Farm to Fork 20% reduction level

PILLAR II AECMS

3. We recommend that Priority Areas for Action (PAAs) that contain waterbodies that have been designated as 'At Risk' from agriculture are ranked highest within Tier One (See An Foram Uisce submission for rationale for this)
4. It is vital that the definition of 'vulnerable water area' is clarified. We recommend that this should be "any water body where agriculture has been identified as a significant pressure"
5. The AECM should be extended beyond 50,000 farmers so that all farmers in the catchment of a vulnerable water area (as defined above) or with a Critical Source Area (CSA) on their land should be illegible to participate

6. SWAN endorses the recommendations of the AFU in relation to AECM measures. In particular we recommend:
7. additional mandatory actions under Tier 2 whereby in areas where phosphorous and sediment run-off have been identified as an issue, measures to attenuate this run-off are required which should include spatially targeted buffer strips and the protection and restoration of wetlands (which provide co-benefits for climate mitigation and adaptation and biodiversity)