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9th December 2020

Joint Committee on Housing, Local Government and Heritage,

Leinster House

Dublin 2

D02 XR20

Tel: (01) 618 3325

E-mail: jchlgh@oireachtas.ie

Invitation to make a submission in relation to Pre-Legislative Scrutiny of the General Scheme of the Water Environment (Abstractions) Bill

Dear Sir/Madam,

ICMSA is a national farm organisation and is the voice of progressive family farming in Ireland. ICMSA would like to take the opportunity to comment on the issues in relation to Pre-Legislative Scrutiny of the General Scheme of the Water Environment (Abstractions) Bill.

ICMSA cannot support the requirement of licencing and further regulation on new abstraction points at a farm scale. This proposal will mean added bureaucracy and expense on farmers with little or no benefit for the environment. It is yet another example of proposed regulations that add bureaucracy and cost on productive businesses and will further undermine their economic sustainability.

The rural Irish economy is hugely dependent on agriculture. For a sector with already volatile incomes and increasing regulations, this proposal will impact on the ability of farmers to further modernise their farm facilities by negatively impacting their financial ability to improve environmental factors on their farm. The environmental regulations on farms are ever increasing and any policy that discourages farmers in modernising water abstraction facilities through added costs not only negatively impact the local agricultural community but also the wider rural economy. It is in the farmers best interest to ensure that an abstraction point is of a high standard to ensure it delivers a high quality water source. The Bord Bia Sustainable Dairy Assurance Scheme (SDAS) which include 16,000 farmers requires water quality to be tested at regular intervals and it is also a requirement of the Dairy Hygiene Regulations. Instead of introducing more regulation on all farms, ICMSA believes that measures should be taken to provide guidelines to farmers or other businesses in terms of the construction and maintenance of wells.

Overall, ICMSA believes that there is a lack of detail in this Bill which impacted the ability to thoroughly analyse and understand the effects this Bill could have on our sector. No details of environmental assessment criteria were given, nor guidelines on best practice for abstraction construction, nor an outline of unacceptable conditions, where licencing is necessary but would not be approved.

“Different sectors abstracting water may be subject to different thresholds and conditions with regard to what is deemed a temporary abstraction.” p.10

There is no indication of which sectors would be subject to different thresholds or what those differences might be. These are all factors to consider when trying to predict the impact the proposed changes could have on our sector.

In summary, ICMSA is proposing that no licensing and assessment should be imposed on farm abstraction points and the draft document amended to acknowledge the hugely important role of agriculture in the rural economy.

Yours faithfully,

Pat McCormack,
President.