

# National Wastewater Sludge Management Plan Consultation 2 Report



## TABLE OF CONTENTS

<b>SUMMARY .....</b>	<b>1</b>
<b>1 PROJECT BACKGROUND .....</b>	<b>2</b>
1.1 INTRODUCTION .....	2
1.1.1 Development of the Draft NWSMP and Consultation 1 .....	2
1.1.2 Consultation 2 .....	3
1.1.3 Next Steps .....	3
1.2 CONSULTATION PROCESS.....	5
1.2.1 Promotion .....	5
1.2.2 Project Webpage .....	6
1.2.3 Elected Representatives .....	6
1.2.4 Statutory Bodies .....	7
1.2.5 Interested Bodies and Stakeholders.....	7
1.2.6 Public Information .....	8
1.2.7 Specific Briefings .....	8
<b>2 FEEDBACK FROM CONSULTATION 2 .....</b>	<b>9</b>
2.1 TREATMENT OF WASTEWATER SLUDGE.....	9
2.2 SLUDGE HUB CENTRE AND SATELLITE SITES UPGRADES .....	10
2.3 LANDSPREADING OF WASTEWATER SLUDGE.....	11
2.3.1 Impact on Agri-Food Sector .....	11
2.3.2 Persistent Organic Pollutants (POPs).....	13
2.3.3 Quality of Wastewater Sludge .....	13
2.3.4 Availability of Land.....	13
2.3.5 Biosolids Application to Energy Crops .....	14
2.4 OPTIONS ASSESSMENT AND ALTERNATIVES.....	14
2.5 QUALITY ASSURANCE MONITORING AND REPORTING .....	15
2.6 DOMESTIC WASTEWATER TREATMENT SYSTEMS .....	17
2.7 IMPLEMENTATION OF THE NWSMP.....	17
2.8 ADDITIONAL COMMENTS/INFORMATION FOR CONSIDERATION IN THE SEA AND NIS.....	18
<b>3 NEXT STAGES OF PROJECT DEVELOPMENT .....</b>	<b>19</b>
3.1 WHAT HAPPENS NEXT.....	19

## APPENDICES

**Appendix A Advertising of NWSMP Consultation 2**

**Appendix B Press Release**

**Appendix C Media Coverage and Media List**

**Appendix D Social Media**

**Appendix E Briefing Note to Interested Bodies**

## SUMMARY

Irish Water is preparing a long-term National Wastewater Sludge Management Plan (referred to as the NWSMP) that will outline its strategy to ensure a nationwide, standardised approach for managing wastewater sludge over the next 25 years.

A national approach will ensure that, for the first time, treated wastewater sludge across the country is effectively managed, stored, transported and disposed of or re-used in a sustainable way, to the benefit of the public and the environment we all live in.

Strategic Environmental Assessment and Appropriate Assessment have been carried out in parallel with the development of the NWSMP.

Strategic Environmental Assessment (SEA) is the process of identifying and evaluating the significant environmental effects that are likely to result from the implementation of a plan or programme at a national, regional or local level. The SEA of the NWSMP has been The SEA process also gives interested parties the opportunity to comment on the environmental impacts of a proposed plan or programme and to also be kept informed during the decision making process.

The SEA Scoping Report for the NWSMP was published in 2015. Consultation 1, a six week non-statutory public consultation, provided all interested individuals and organisations with an opportunity to feed into the SEA Scoping Report to determine the scope and level of detail of information to be included in the environmental report for the NWSMP. Feedback from Consultation 1 was taken into account in the development of the Draft NWSMP and associated environmental report and presented in the NWSMP Consultation 1 Report available at <https://www.water.ie/projects-plans/wastewater-sludge-management/>

The EU Habitats Directive requires that a study called an Appropriate Assessment (AA) be carried out for any project that is considered likely to have a significant impact on a Natura 2000 site. A Natura Impact Statement (NIS), a report that contains an examination of the possible impacts of a project on Natura 2000 sites, in support of the AA of the Draft NWSMP was prepared and is available at [www.water.ie/projects-plans/wastewater-sludge-management/](http://www.water.ie/projects-plans/wastewater-sludge-management/).

Irish Water published the Draft NWSMP, the SEA Environmental Report and the Natura Impact Statement in March 2016. These reports were the focus of an 8-week statutory public consultation from 23<sup>rd</sup> March to 18<sup>th</sup> May 2016. Consultation 2 was the second public consultation to inform the development of the NWSMP.

Through Consultation 2 Irish Water sought feedback from the public, statutory consultees and all interested individuals and organisations on the Draft NWSMP, the SEA Environmental Report and the Natura Impact Statement.

The first section of this report sets out the activities undertaken to ensure widespread awareness of Consultation 2, while the second section of the report sets out the feedback raised by stakeholders during the consultation process. Submissions received from individual members of the public have been reported anonymously and feedback from organisations has been attributed to them in the Consultation Reports.

# 1 PROJECT BACKGROUND

## 1.1 INTRODUCTION

Since its incorporation in 2014, Irish Water now has the responsibility to provide water and wastewater services in Ireland from 31 local authorities. This includes managing approximately 856 water treatment plants and approximately 1,000 wastewater treatment plants.

Irish Water is currently preparing the National Wastewater Sludge Management Plan (referred to as the NWSMP throughout this document), which will set out its high level strategies for wastewater sludge management over a 25-year horizon.

The NWSMP outlines a national approach to ensure, for the first time, that treated wastewater sludge across the country is effectively managed, stored, transported and disposed of or re-used in a sustainable way, to the benefit of the public and the environment we all live in.

This is in keeping with the objectives of Irish Water's *Water Services Strategic Plan (WSSP)*, which is Irish Water's 25-year strategy for the delivery of water services, available at <https://www.water.ie/projects-plans/our-plans/>.

The NWSMP focuses on sludge generated at wastewater treatment plants. Sludge generated at water treatment plants will be assessed separately by Irish Water.

The NWSMP will take into account current legislation and guidance documents in relation to the treatment and utilisation of wastewater sludge in addition to potential environmental impacts and sustainability of proposals.

The recommendations of the NWSMP will be used to inform future capital and operational activities in relation to wastewater sludge management.

### 1.1.1 Development of the Draft NWSMP and Consultation 1

The SEA Directive requires that certain Plans and Programmes, prepared by statutory bodies, which are likely to have a significant impact on the environment, be subject to the SEA process.

Screening of the proposed NWSMP was undertaken by Irish Water in 2014 and a decision was taken to undertake an SEA.

As part of the process, an SEA Scoping Report was published on Tuesday, 12<sup>th</sup> May 2015. The SEA Scoping Report established the range of environmental issues and level of detail of information to be included in the environmental reports.

Following that, a non-statutory public consultation (Consultation 1) was held in 2015 that provided all interested individuals and organisations with an opportunity to feed into the SEA Scoping Report.

Feedback received as part of Consultation 1 was published and issues raised informed the development of the SEA Environmental Report and Draft NWSMP. The Draft NWSMP and Consultation 1 Report are both available on the dedicated NWSMP webpage <https://www.water.ie/projects-plans/wastewater-sludge-management/>.

### **1.1.2 Consultation 2**

Irish Water published the Draft NWSMP, the SEA Environmental Report and the Natura Impact Statement as part of the statutory public consultation which ran for eight weeks from 23<sup>rd</sup> March until 18<sup>th</sup> May 2016.

Through Consultation 2 Irish Water sought feedback from the public, statutory consultees and all interested individuals and organisations on the Draft NWSMP, SEA Environmental Report and Natura Impact Statement.

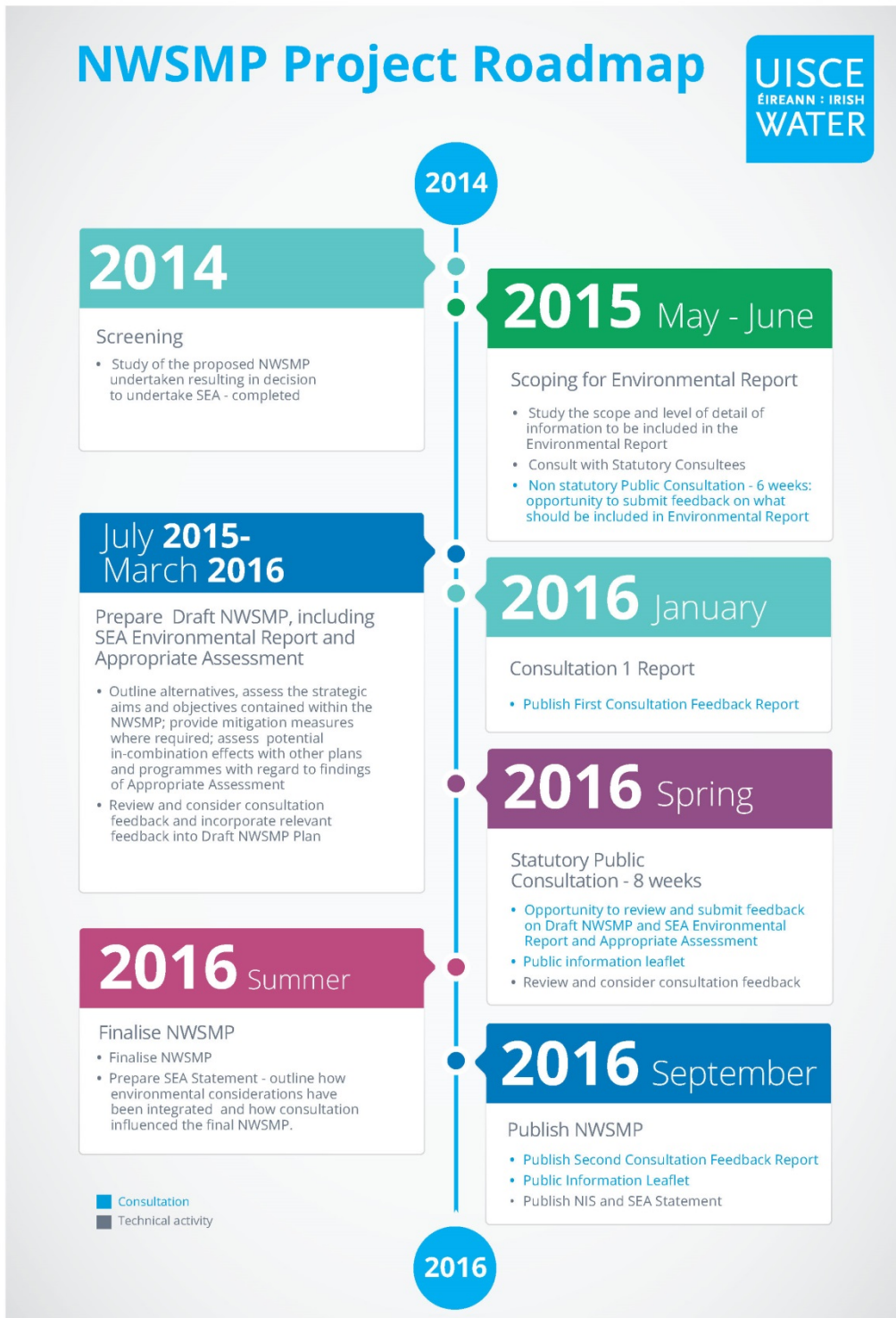
All of the communications activities undertaken as part of this statutory public consultation are summarised below in Section 1.2 while feedback received is summarised in Section 2.

### **1.1.3 Next Steps**

All feedback has been reviewed and, where relevant, incorporated into the final NWSMP.

The final NWSMP is available to view online here <https://www.water.ie/projects-plans/wastewater-sludge-management/>.

Figure 1.1: Project Road Map





## 1.2 CONSULTATION PROCESS

A range of communications tools were employed for Consultation 2 in order to raise levels of awareness of the project and to facilitate participation in the consultation process.

Key components of the consultation process included:-

- Advertising
- Public Relations
- A dedicated project webpage hosted on the Irish Water website
- A public information leaflet available in both English and Irish
- All environmental reports, the Draft NWSMP and Consultation 1 Report available online
- Social media
- Mail-outs and briefings to:-
  - Elected Representatives;
  - Local and Regional Authorities;
  - Statutory Bodies;
  - National and Regional Media;
  - Interested Bodies;
  - Interested members of the public.

This section of the report provides further details on each of the above consultation components.

### 1.2.1 Promotion

Awareness of the consultation was achieved through a combination of advertising and public relations.

#### 1.2.1.1 Advertising

Adverts were placed in the national newspapers the Irish Independent and the Irish Farmers' Journal on 24<sup>th</sup> March 2016, copies of which are included in Appendix A.

#### 1.2.1.2 Public Relations

Public relations activities included issuing news releases to national and local media organisations to generate press, radio and online media coverage. The press release announced the commencement of consultation on the Draft NWSMP, provided information on where further information was available, and also detailed the purpose of the consultation and how people could participate. The press release can be read in full in Appendix B. The news section of the Irish Water website, [water.ie/news](http://water.ie/news), was also utilised to promote and encourage participation in the public consultation.

Copies of the national and local news coverage along with a list of media outlets that were issued press releases are contained in Appendix C.



The press release was also promoted on Irish Water's social media channels including LinkedIn and Twitter, copies of which are included in Appendix D.

### 1.2.2 Project Webpage

All relevant project information, including an electronic version of the Draft NWSMP, SEA Environmental Report and Natura Impact Statement was made available online in May 2015 when consultation commenced and remains in place on a dedicated page within the Irish Water website at <https://www.water.ie/projects-plans/wastewater-sludge-management/>. This webpage has been updated in line with the development of the project:-

- The SEA Scoping Report for the NWSMP and information on the project and on Consultation 1 was made available on the webpage on Tuesday, 12th May 2015;
- The NWSMP Consultation 1 Report was published online on 27th January 2016;
- The Draft NWSMP, SEA Environmental Report and Natura Impact Statement and information on how to participate in Consultation 2 was made available on the webpage on Wednesday, 23rd March 2016.

The project website also invited members of the public to submit written submissions or observations to Irish Water by Wednesday 18<sup>th</sup> May 2016:

**By Email:** [nwsmp@water.ie](mailto:nwsmp@water.ie)

**Or by Post:** **National Wastewater Sludge Management Plan, Irish Water,  
Colvill House, 24-26 Talbot Street, Dublin 1, Ireland.**

The project website also provided interested stakeholders with the option to sign up for further information. The project roadmap and public information leaflet were also made available to download in both English and Irish.

Between March and May 2016 there were 1,504 page views on the dedicated project webpage with 1,003 of these being unique page views.

### 1.2.3 Elected Representatives

In recognition of the mandate given to national elected representatives and the critical role they play in representing the public and the public interest, Ministers, TDs, MEPs, Senators and Councillors were identified as priority stakeholders. Notice of publication of the Draft National Wastewater Sludge Management Plan and associated SEA Environmental Report and Natura Impact Statement was issued by Irish Water to all the elected representatives in Ireland, including information on Consultation 2.

Officials in all the City and County Councils in Ireland were contacted and informed of the commencement of Consultation 2.

## 1.2.4 Statutory Bodies

### 1.2.4.1 Consultation

As detailed in the NWSMP Consultation 1 Report, statutory consultation on the NWSMP commenced on 12<sup>th</sup> May 2015 when a Scoping Report and letter were sent to the five statutory consultees for SEA in Ireland. In addition, statutory consultation was also undertaken with the NIEA (Northern Ireland Environment Agency) in the context of transboundary impacts.

A workshop was subsequently held on July 7<sup>th</sup> 2015 to discuss the NWSMP and the scope and level of detail of the environmental assessment of the plan.

As part of Consultation 2, Irish Water, as the Competent Authority for the National Wastewater Sludge Management Plan, provided notice of publication of the Draft NWSMP and associated SEA Environmental Report and NIS to the following five statutory authorities, and the NIEA on 22nd March 2016:-

- Environmental Protection Agency (EPA);
- Department of Arts, Heritage and the Gaeltacht (DAHG);
- Department of Communications, Energy and Natural Resources (DCENR);
- Department of the Environment, Community and Local Government (DECLG); and
- Department of Agriculture, Food and the Marine (DAFM).

Meetings were facilitated between Irish Water and the statutory authorities on request.

Feedback from Consultation 2 from the statutory authorities is included in Section 2 of this report.

## 1.2.5 Interested Bodies and Stakeholders

As detailed in the NWSMP Consultation 1 Report, stakeholder groups and community leaders from the following sectors were identified:-

- Agriculture;
- Environment;
- Elected Representatives;
- Community Organisations;
- Business Organisations;
- Statutory/Strategic Stakeholders.

A briefing note inviting participation in the public consultation for the Draft NWSMP and associated environmental reports, along with a link to the documents, was emailed on behalf of Irish Water to the groups identified from the list above, additional interested bodies and to stakeholders who contributed to the previous consultation process in 2015. The information sent is included in Appendix E.

### **1.2.6 Public Information**

Each Local Authority was contacted and asked to display a hard copy of the Draft NWSMP, SEA Environmental Report and NIS and printed information leaflets on the Draft NWSMP at their planning counters.

County Librarians in each Local Authority were contacted and asked to display printed information leaflets in their County/City Library.

A list of the Local Authorities and libraries that information was sent to is included in Appendix D.

### **1.2.7 Specific Briefings**

Specific briefings were held upon request, for example Irish Water accepted an invitation to meet the Ibec NWSMP Working Group on 17<sup>th</sup> May 2016 to discuss the Draft NWSMP. This meeting informed the Ibec submission on the Draft NWSMP, feedback from which is included in Section 2 of this report.

## 2 FEEDBACK FROM CONSULTATION 2

There were 40 (17 query forms and 23 submissions) responses received during Consultation 2. A national approach to wastewater sludge management through the development of the NWSMP was broadly welcomed in the submissions received.

The following section is a compilation of the issues raised. Everything included in the section below is taken directly from stakeholder feedback. Many submissions reiterated similar themes; therefore some of the issues raised are quoted directly from submissions, while others are a summary of issues raised by a number of submissions.

This feedback, where relevant, was taken into account in the development of the final NWSMP and associated SEA Statement.

### 2.1 TREATMENT OF WASTEWATER SLUDGE

Stakeholders welcomed proposals, as set out in the Draft NWSMP, to phase out the use of off-site sludge treatment by lime stabilisation and suggested that a defined timeline for this phase out should be identified, as a means of incentivising the development of alternatives. Others supported the increased use of lime in the alkaline stabilisation process, due to its beneficial use on agricultural land as a valuable organic fertiliser that is high in nutrients.

Stakeholders supported the Draft NWSMP proposals with respect to Anaerobic Digestion (AD) in the treatment of wastewater sludge. InSinkErator stated that waste entering wastewater treatment plants from Food Waste Disposer (FWD) units play a positive and constructive role in facilitating energy recovery by (AD). Cré stated that all composting and anaerobic digestion plants in Ireland provide a superior level of control and treatment compared to lime stabilisation and are regulated by either the relevant Local Authority or by the Environment Protection Agency (EPA). It noted that the Draft NWSMP does not consider sludge treatment by composting plants and recommended that existing composting plants around the country, which are regulated to a high standard, be used to process wastewater sludge, in combination with anaerobic digestion, thus avoiding a capital requirement from Irish Water.

With respect to the intention, referred to in the Draft NWSMP, to assess the potential for co-digestions of organic wastes with sludge material in order to improve the economic feasibility of AD facilities, H&L outlined that Irish Bioenergy Association (IrBEA) has developed a national standard for anaerobic digestion digestate to a draft stage. They noted that the standard does not allow for the inclusion of wastewater sludge as a feedstock and recommended that Irish Water consult with IrBEA as to the potential for development of a separate standard, or a revision of the existing draft, to address the co-digestion issue.

Response Engineering Ltd. (REL) highlighted that, following a technical feasibility study of using Advanced Pyrolysis Treatment, it is now progressing plans to proceed with pyrolysis as its preferred solution for sludge management at its 35 wastewater treatment plants around Ireland.

ZWAI recommended that reed bed or Integrated Constructed Wetland (ICW) treatment be further explored, some stakeholders noted that discharge from the Clonaslee treatment plant should use

this process. The EPA recommended that the final NWSMP describe at what point reed beds fail to be efficient in terms of sludge management.

ZWAI advised that ferric sulphate should be added instead of aluminium sulphate for removal of phosphorus from wastewater as aluminium is more toxic than iron in dissolved form. ZWAI also recommended that Irish Water should develop a scheme that incentivises homes and industries to avoid or prevent the production of excessive quantities of wastewater which would reduce the amount of wastewater sludge generated.

## 2.2 SLUDGE HUB CENTRE AND SATELLITE SITES UPGRADES

With regard to the "Sludge Hub Centre and Satellite Site" system and proposed upgrades, the EPA recommended that the provision of sludge management facilities should be prioritised and directed towards wastewater treatment plants that are breaching authorisation limits due to the lack of sludge management infrastructure. It proposed that desludging at wastewater treatment plants should be carried out at appropriate frequencies and volumes to prevent breaches of authorisation limits. It recommended that the flood risk vulnerability of proposed additional infrastructure should be assessed and that the requirements of the Flood Risk Management Guidelines be taken into account. The EPA further recommended that Irish Water should include a commitment in the final NWSMP to establish environmental management plans for proposed additional wastewater related infrastructure (or upgrades to existing facilities), where potential exists to significantly impact negatively on environmental vulnerabilities/sensitivities. The EPA also stated that the NWSMP needs to ensure that the deficiency in wastewater sludge management facilities in the west of Ireland is addressed.

Galway County Council (GCC) questioned whether consideration was given, in the development of the Draft NWSMP, to the suggested East Galway Wastewater Treatment Plant (WwTP) including Sludge Hub Centre, together with satellite facilities in five towns, including Tuam. They noted the Draft NWSMP suggests that Tuam is considered to be a suitable location for a Sludge Hub Centre and sought clarification on the location of hub and satellite centres proposals. GCC highlighted that the need for the East Galway WwTP was included in the Galway Sewerage Scheme Phase 3 and is considered a critical project for the region and asked that it be given due consideration, particularly as the NWSMP represented a 25-year strategy.

Kerry County Council (KCC) highlighted that sludge dewatering facilities are available at Killarney, Tralee, Dingle, Listowel, Castleisland, Kenmare, Cahersiveen and Killorglin and that the plants at Killarney and Killorglin are currently adequate to accept settled activated sludge (e.g. from Rathmore and Glenbeigh wastewater treatment plants). It expressed concern that Killorglin and particularly Cahersiveen are not included in the list of sites proposed for 'sludge import facilities' and recommended that they be included in the list of sites with sludge acceptance facilities. It stated that this omission would result in an unsustainable transport outcome and inevitable undesirable environmental issues.

KCC also recommended that detailed economic and environmental assessments should be carried out for continuing the operation of the existing dewatering facilities at the proposed sludge acceptance sites.

KCC highlighted that Killarney WwTP meets the definition of a Hub and produces a Class A pasteurised sludge that is disposed of locally to agriculture. However, the Draft NWSMP states that

there is no Sludge Satellite or Hub in Kerry and that all sludges are sent off site for treatment and disposal. KCC requested clarification on the future of the Autothermal Thermophilic Aerobic Digestion (ATAD) plant in Killarney WwTP.

While the Draft NWSMP recommends a Sludge Hub Centre with advanced anaerobic digestion for Tralee WwTP, KCC highlighted that Tralee WwTP has an anaerobic digester and gas turbine which have been taken out of operation for economic reasons due to a lack of sufficient feedstock. They suggested that the assessment of Tralee WwTP as the Kerry Hub should take account of a number of investigations completed on the potential for co-digestions of the wastewater sludge and mixed organic waste in the existing plant.

Tipperary County Council (TCC) made a detailed submission to Irish Water to inform the formal submission of the Emerging Investment Plan to the Commission of Energy Regulation (CER) and asked that cognisance be taken of that submission in the finalisation of the NWSMP. TCC was concerned that very low and unreasonable population growth rates have been used by Irish Water in the Draft NWSMP, which are at significant odds with population figures provided by the DECLG and by the Mid-West and South East Regional Planning Guidelines. They cited concern that figures for the predicted wastewater sludge load per county would be impacted if these low population growth figures were used to inform the development of the plan, and that this could adversely affect the implementation of the NWSMP.

TCC also noted that details in the final NWSMP with respect to North and South Tipperary County Councils should be combined to reflect the amalgamation of these counties.

Tipperary County Council requested that a full cost-benefit analysis (including transport costs) be applied to the recommendations of the Draft NWSMP with respect to the upgrade of wastewater sludge treatment and import facilities in County Tipperary.

## **2.3 LANDSPREADING OF WASTEWATER SLUDGE**

### **2.3.1 Impact on Agri-Food Sector**

Stakeholders expressed concern that landspreading remains the preferred option for the re-use of wastewater sludge under the Draft NWSMP and considered that this would be detrimental to Ireland's critically important food sector, noting the possible presence of heavy metals, pathogens, pharmaceuticals and complex organic compounds. Other stakeholders were concerned that there is a knowledge gap regarding the exact constituents of treated wastewater sludge and that Irish Water should consider this area as a priority topic for research.

Stakeholders stressed the importance of the agri-food sector to Ireland, referencing Foodwise 2025, the strategic plan for Ireland's agri-food sector and deemed that greater consideration must be given to the impact of quality assurance schemes such as:-

- Bord Bia Origin Green Initiative;
- Sustainable Dairy Assurance Scheme (SDAS);
- Beef & Lamb Quality Assurance Scheme;
- Irish Grain Assurance Scheme.

Stakeholders noted that one of the requirements of SDAS and other Bord Bia quality assurance schemes is that raw or treated sewage sludge is prohibited from being used on Bord Bia certified farms. Some noted that landspreading of wastewater sludge on agricultural land has been banned as a practice in the Netherlands and Switzerland.

The Department of Agriculture, Food and Marine (DAFM) expressed concern that the Draft NWSMP does not adequately deal with the issues around quality assurance schemes and land application of wastewater sludge. It recommended the NWSMP should stress that land subject to quality assurance schemes is not available for landspreading and that landspreading of wastewater sludge should be prioritised to non-food crops.

Feedback from stakeholders suggested Irish Water should investigate alternative crops such as energy crops and forestry for the recovery of treated wastewater sludge that may not have negative consumer sentiment.

Other feedback included stakeholder views that there should be a coherent policy approach across all Government Departments and State agencies with regard to the use of landspreading in the management of wastewater and that Irish Water should commit to this approach in the final NWSMP.

Ibec welcomed the commitment by Irish Water to restrict wastewater sludge spreading on land covered by food quality assurance schemes, but also noted its concern about the potential implications of using such sludge on other lands used to produce animal feed not covered by quality assurance schemes.

Some stakeholders pointed out that there was scope to go beyond the measures identified in the Draft NWSMP to provide the reassurances required to alter the perceptions that currently hinder the use of biosolids in land application. Their view was that an agricultural outlet must remain available to biosolids, given the benefits associated with land spreading and the economics of this form of sludge management.

Stakeholders also stated that Irish Water should play a central role in promoting the benefits of biosolids applications and confronting the perception issues that exist in relation to landspreading and the need to protect Ireland's 'green image' in terms of food production, which some noted was informed more by sentiment rather than scientific fact.

While the Irish Co-operative Organisation Society Ltd. ICOS acknowledged that the Draft NWSMP confirms that land used for dairy cattle is not considered to be a viable option due to concerns by the dairy industry, it challenged the NWSMP statement that the concerns of the dairy industry relate only to perception issues.



### 2.3.2 Persistent Organic Pollutants (POPs)

ZWAI asked that Irish Water should take Ireland's obligations under the Stockholm convention into account which are to avoid, minimise and, where feasible, eliminate emissions of persistent organic pollutants (POPs).

While the EPA acknowledged the inclusion of aspects relating to POPs within the Draft NWSMP, it suggested that the final NWSMP addresses minimising the potential for bio-accumulation of substances in soils from the landspreading of treated wastewater sludge.

The EPA also suggested that the final NWSMP incorporates a programme for monitoring POPs and other contaminants of emerging concern in the context of protecting the environment and securing food safety. It proposed that this includes the sampling and analysis of sludge and the receiving soils from wastewater treatment plants servicing population equivalents in excess of 100,000 as well as contingency plans for risk mitigation when elevated concentrations of contaminants are observed.

### 2.3.3 Quality of Wastewater Sludge

Stakeholders noted that the variability in quality and consistency of wastewater sludge from different wastewater treatment plants is a significant factor affecting confidence in the Irish Agricultural Sector for biosolid re-used on agricultural land. They were of the opinion that Irish Water should seek to implement robust quality control procedures to ensure consistency of material for landspreading.

The IFA stated that if wastewater sludge/biosolid is to be used on agricultural land it is critical that proper standards are laid down and adhered to including that the material:-

- Is pasteurised and guaranteed free from harmful pathogens;
- Is free from contamination from harmful substances, including heavy metals;
- Has a minimum dry matter content;
- Has a declaration of available nutrients;
- Has a physical and nutritional consistency;
- Is destined for use on suitable arable crops/non-food crops only and is excluded for use on milling wheat, milling oats and malting barley crops, as well as vegetables destined for human food consumption.

### 2.3.4 Availability of Land

Stakeholders highlighted the issue of availability of suitable land for landspreading, noting that Ireland currently relies on agriculture as an outlet for 98% of its wastewater sludge disposal. They noted that there is likely to be less land available in the long term for landspreading due to an increased take up of quality assurance schemes, customer demands and other market pressures and that alternative options must be considered in spite of significant costs associated with some possible alternatives.

Stakeholders suggested that it may be worth readdressing farms in quality assurance schemes that are part tillage/part livestock to see if the tillage areas of these farms can be made available for

landspreading, however, it would be important to ensure traceability of the land-use in such cases for the purpose of quality assurance.

Some stakeholders provided feedback that, in their opinion, the Draft NWSMP has significantly underestimated the land actually available for the recovery of municipal sludge in Ireland. Ibec noted that while the area of animal fodder cereals land was provided in the Draft NWSMP, it is unclear how much of this is not covered by a quality assurance scheme. It highlighted that it would be a concern if any of this fodder, which would be subject to landspreading, is sold into the beef or dairy industry.

### **2.3.5 Biosolids Application to Energy Crops**

H&L stated that a minor legislative amendment is required to address the anomaly whereby biosolids application to agricultural land is not restricted, yet application to energy crops is. It suggested the development of a working group or similar to address the restriction of land application to energy crops. It also asked that consultation with the EPA be undertaken to explore whether flexibility regarding end of waste criteria could be considered for biosolids applied to land.

## **2.4 OPTIONS ASSESSMENT AND ALTERNATIVES**

As previously noted, stakeholders asked that alternatives to land spreading be considered for wastewater sludge. They encouraged new approaches to safely capture and re-use all of the potentially valuable resources arising from wastewater treatment. They recognised that there may be a significant cost to investing in alternatives, but advocated that a move must be made towards solutions like enhanced treatment of sludge and energy recovery.

The EPA proposed that energy recovery be incorporated into the high level strategic objectives of the NWSMP. It suggested that Irish Water should strive over the lifetime of the NWSMP to recover the nutrient and energy potential of wastewater sludge. It proposed the promotion of the concept of energy recovery at treatment hubs, from processes such as anaerobic digestion. It further suggested that the aim for each hub would be to become energy self-sufficient as a long term sustainable target to improve the overall environmental performance of the facility and improve business resilience.

Some stakeholders proposed that biodigesters be used to treat slurry from pig farms and cattle sheds.

Ibec proposed that the NWSMP give greater consideration to incineration in its various forms, and research best practices in other EU Member States and elsewhere. Their submission continued that such consideration would include appropriately thorough cost-benefit analyses that take into account all relevant economic factors, including, but not limited to, the cost of spreading versus the cost of incineration, the value of fertiliser (whether produced domestically or imported), as well as the current and future security of incineration supply.

The Irish Technology Centre for Biorefining and Bioenergy (TCBB RESOURCE) suggested that the current network of wastewater treatment plants offers the opportunity for one large national network of renewable energy centres, creating the potential to convert cost centres to revenue-generating centres, thus generating revenue for Irish Water. It recommended that a number of wastewater treatment sites could be adapted to introduce a cluster of renewable gas technologies that work in an integrated fashion to efficiently generate a valuable renewable gas. It stated that introducing such technologies at WwTP sites would convert organic loads into biomass rather than sludge, generating an energy carrier that can be used on-site and reducing the energy cost of aeration. It further asserted that doing so would aid Ireland's compliance with EU environmental and renewable energy directives.

Ibec suggested that a clear distinction be made in the NWSMP between the various forms of thermal treatment currently available in Ireland, namely waste to energy and cement kilns. It noted that experience in Europe demonstrates the effectiveness of cement kilns for the treatment of biosolids/sludge, which are commonly used as both a source of energy and also a source of raw material in a thermal process that results in no ash for disposal. Ibec stated that the cement kilns in Ireland already have the appropriate planning or licence permissions, or are actively seeking permission to use biosolids/sludge from the treatment of wastewater.

Stakeholders noted that there are options for recovering phosphate from ash generated from mono-incinerators dedicated to the treatment of sludge. However, they also pointed out that certainty of demand is required for the development of large scale advanced thermal treatment facilities specifically for sludge.

Indaver Ireland noted that European member states which have successfully developed thermal treatment infrastructure have put in place policy drivers (such as a ban on landfill and restrictions /ban on land spreading) and/or financial mechanisms (such as subsidies). It suggested that the NWSMP sets out clear actions for the provision of alternatives in line with Ireland's three waste management plans.

The EPA recommended that a specific commitment is included in the final NWSMP, to incorporate the requirements of the Water Framework Directive as relevant to the siting, design and operation of wastewater related infrastructure and in conducting wastewater sludge management and related activities on those sites. It also recommended that a specific commitment be included to integrate the second round of River Basin Management Plans and associated Programmes of Measures upon their adoption within the lifetime of the Plan.

The EPA also noted that the potential environmental effects which may arise from using alternative treatment and disposal technologies should be considered prior to their implementation.

## **2.5 QUALITY ASSURANCE MONITORING AND REPORTING**

Stakeholders proposed that, in order to increase industry confidence in the landspreading of wastewater sludge/biosolids and to secure and stabilise the recovery route as an organic fertiliser on Irish agricultural farmland, it is extremely important to design and implement a quality assurance scheme for the entire wastewater treatment process, from source control of pollutants, through to sludge treatment and reuse.

The EPA suggested that Irish Water undertakes sufficient tracking and monitoring of treated wastewater sludge applied to agricultural land to ensure that it is environmentally and agronomically safe and appropriate to do so and at levels which ensure that the nutrients can be effectively used for plant growth or assimilated into the soil.

Some stakeholder feedback proposed the development of an industry 'Biosolid Quality Assurance Standard' similar to the Biosolid Assurance Standard/Safe Sludge Matrix adapted in the UK in order to achieve operational consistency and demonstrate transparency in the recovery of municipal WwTP sludges to agriculture.

The IFA recommended the following measures be put in place for the treatment of wastewater sludge:-

- Training, licensing and auditing of plant operators, contractors and hauliers;
- Creation of a biosolid nutrient matrix management plan in consultation with industry and farmers;
- Insurance indemnifying farmers from any potential claims relating to the use of treated sludge;
- Gate fees for use on arable land.

Ibec encouraged Irish Water to work with stakeholders to update the Code of Good Practice (COGP) for the use of Biosolids in Agriculture, and potentially develop quality standards for different categories of wastewater sludge to ensure appropriate end use. It suggested that Irish Water commits to a rigorous enforcement process to ensure that wastewater sludge spread on land is in accordance with the Code of Good Practice, through audits and certification of suppliers.

Stakeholders stated that strong consideration be given to placing the Code of Good Practice on a legislative footing in order to strengthen the 'control regime' for sludge treatment. H&L suggested that the COGP be revised to phase out the use of alkaline stabilisation for sludge treatment over a specified timeframe.

H&L suggested that a timeline for the completion of the development of the wastewater treatment quality assurance scheme be put in place, and suggested that this would be within 12 – 18 months of the issue of the final NWSMP. It suggested that development of a similar model to that of the DAFM Compost Quality Assurance Scheme be considered by Irish Water when developing their wastewater sludge management quality assurance scheme.

SWAN emphasised that there must be a strong focus on nutrient management in any quality assurance system proposed as well as the risk to water bodies in the receiving catchment, and that particular attention must be paid to At Risk and High Status water bodies and ensuring continued compliance with the Water Framework Directive objectives. It suggested that Irish Water works with the EPA Catchment Science and Management Unit and Teagasc in relation to nutrient management planning. SWAN also supported recommendations from the DAFM that the total nitrogen and total phosphorus content per ton must be declared by the supplier in accordance with the Waste Management (Use of Sewage Sludge in Agriculture) Regulations.

## 2.6 DOMESTIC WASTEWATER TREATMENT SYSTEMS

The EPA welcomed the adoption of its recommendation that Irish Water plan for the reception of Domestic Waste Water Treatment System (DWWTS) sludge. It stated that a clear national strategy for the management of DWWTS sludge is required and collaboration with other relevant parties (statutory agencies and permitted contractors) should be considered in this regard.

SWAN highlighted that there is a 50% deficit in capacity to receive and treat DWWTS wastewater and expressed its concern that the Draft NWSMP does not outline how it would address this situation.

SWAN challenged Irish Water's assertion that there will not be significant increases in DWWTS sludge produced during the lifetime of the NWSMP. It asserted that if the EPA's National Inspection Plan for DWWTS is effective then it should result in a significant increase in homeowners desludging their systems and therefore an increase in DWWTS sludge that needs to be processed. SWAN also questioned where the remaining sludge, that is not collected by private contractors or spread on land by farmers, will go. It expressed concern that that this would pose an uncontrolled risk to the environment.

Kerry County Council (KCC) welcomed the national approach to the commitment to cater for sludge from DWWTS. However it expressed concerns in relation to the Draft NWSMP statement that sludge from DWWTS would be accepted only at 'those sites defined as satellite dewatering centres'. It noted that this would result in septic tank sludges being transported long distances in tractor-towed tanks. KCC recommended that the final NWSMP should allow for the limited acceptance of DWWTS sludges at peripheral Irish Water plants that will in turn feed into satellite centres. It also recommended that a sufficient network of Sludge Acceptance Facilities be provided so that DWWTS sludges can be disposed of in all areas. It stated that, if necessary, the provisions and operation of these facilities should be subvented by Irish Water and/or the Department of Housing, Planning, Community and Local Government (formerly the Department of the Environment, Community and Local Government) in the interests of protecting the environment and supporting rural communities.

ZWAI noted that adequate income needs to be generated from sludge acceptance facilities for DWWTS sludge to ensure ongoing treatment and disposal of DWWTS sludge and suggested that human excrement be managed in a more cost-effective and environmentally friendly way. It suggested that urine separation and toilet solids separation should be one of the first steps towards a more sustainable and safer way to recycle nutrients to agriculture. It encouraged Irish Water to work with the Department of Housing, Planning, Community and Local Government (formerly the Department of the Environment, Community and Local Government) to develop awareness, training and standards for urine separation at source.

## 2.7 IMPLEMENTATION OF THE NWSMP

The EPA recommended that the final NWSMP should include a separate section on Governance and Implementation with provisions for robust and transparent mechanisms to oversee the implementation of the NWSMP actions and commitments. It asked that the final NWSMP would include a commitment that ensures temporary effects associated with implementing the NWSMP are considered and mitigated for.

## **2.8 ADDITIONAL COMMENTS/INFORMATION FOR CONSIDERATION IN THE SEA AND NIS**

DAERA highlighted that a proposed marine Conservation Zone is currently the focus of a public consultation and noted that the boundary for Carlingford Lough SPA has recently been extended and that the North Channel pSAC and East Coats Marine pSPA have recently been proposed as Natura Sites.

The EPA asked that the NWSMP clarifies whether any wastewater infrastructure within the remit of Irish Water is present in South Dublin County Council or whether it is managed through other adjacent Local Authority wastewater infrastructure.

The EPA suggested that the SEA considers describing the potential impacts on landscape which may arise in implementing the NWSMP.

## 3 NEXT STAGES OF PROJECT DEVELOPMENT

### 3.1 WHAT HAPPENS NEXT

The feedback received during Consultation 2 has been reviewed by the project team, and issues raised have informed the development of the final NWSMP, with relevant feedback being incorporated into the environmental reports.

The final NWSMP will be published in September 2016 and will be available to view on the project website <https://www.water.ie/projects-plans/wastewater-sludge-management/>



## **APPENDIX A**

### **ADVERTISING OF NWSMP CONSULTATION 2**



It's all kicking off in Glasgow

Competition is heating up as stars in a 2016 fight in the Row in Inverclyde during the Glasgow International Boxing Championships at Glasgow's Royal Biscuit Hall. More than 5,000 competitors from across the globe are taking part in the championships, the most prestigious event in the international calendar. Our pictures show a doctor in full hospital gloves, consultants looking at some of the stars in the ring. Photos: Danny Lennon/WA, WPA

## Pensioner guilty of assault in row over horse manure pile

**Gordon Deegan**

A CLARE pensioner has been convicted of assault in a row with his neighbour over the pensioner piling horse manure on a wall that divides the two men's properties.

At Exeter District Court, Brett Poyton (46) told the court how he was assaulted by 48-year-old neighbour Joe Williams of Ballyvarna, Kilsbanny when the pensioner struck him on the head with a piece of scrap.

Mr Poyton said that he was struck on the head by Mr Williams after he tried to cut down plastic sheeting on the wall that contained the horse manure and the other rubbish that was spilling into his rented property.

In court, Insp Tina Kennedy put it to Mr Williams that "you deliberately piled on the horse manure on the wall in an effort to intimidate, antagonise and annoy Mr Poyton".

Insp Kennedy said: "You meant Mr Poyton living in the

property beside you. That is what this is about." In reply, Mr Williams said: "Not at all. I never intimidated anyone."

Insp Kennedy said that it was "very unusual behaviour" to be piling horse manure on a wall looking onto his neighbours' houses and the excuse advanced by Mr Williams that he was putting the horse manure there as a deterrent to crows led to cut his horses' feed "is not credible".

In reply, the farmer said: "It is doing the job for me as a pig grower."

In evidence, Mr Poyton told the court that Mr Williams told him that "he would continue to pile up the horse manure until I moved out".

Mr Poyton has rented his home with his partners, Clare Gallagher and two children for the past three years.

Recalling the assault that occurred on the afternoon of April 4th last year at his home at Ballyvarna near the town of Clare village of Kilsbanny, Mr Poyton said that the several days prior,

Mr Williams had been piling on the rubbish, including horse manure, on black wrapping on top of the wall that borders the two properties.

Mr Poyton said that horse manure was dropping into his garden and he went to cut the plastic wrapping down.

He said: "I gathered the black wrapping in my hand and then 'smack' - Joe Williams had hit me with a piece of scrap across the head from across the wall."

Mr Poyton said that he received a "cut on my head and three stitches and scrapes".

In his evidence, Mr Williams denied that he struck Mr Poyton, stating "I had nothing in my hands. I never hit a man in my life and I have no intention of".

He said: "Mr Poyton was roaring like a mad man saying 'you're a thief' and 'you're a tramp'".

In his judgement, Judge Arth King said that he "was satisfied that Mr Williams did strike Mr Poyton and is guilty as charged".

## Women arrested as part of huge garda raid fail to appear in court

**Greg Markin**

A JUDGE has issued arrest warrants for two women who failed to appear in court yesterday on charges related to a massive garda operation earlier this week.

Ann Marie O'Donoghue (41), from Bownwood, Enniscorthy, Co Wick, and Nora O'Reilly (44), The Crescent, Beaumont Heights, Foxrock, Wexford, were due to appear at Clontarf District Court yesterday.

Ga. Brian Conroy told Judge Paul Kelly that the women were detained at their homes on Tuesday.

"It was part of a major operation involving 60 garda targeting crime," said Ga. Conroy.

"The garda from Dosegao were also involved as a result of these alleged offences."

The garda said both women were arrested and were released on €300 garda bail.

He said he was on the garda operation and both women had been charged with thefts at two shops in Ardara, Co Donegal, on September 12 last year.

It was alleged the women ordered Bonner's Gift Shop and McCabe's shop in the town and stole a number of items.

The witness said the women had remained silent when the charges were put to them at Enniscorthy Garda Station on Tuesday. However, he told the judge that neither of the two accused had appeared in court yesterday.

Supt Colm Nevin asked the judge to revoke garda bail.

Judge Kelly then issued warrants for the arrests of both women.

Meanwhile, garda have released more details on the operation which took place on Tuesday.

The targeted search, property believed to be

stolen, with an estimated value of €20,000, was recovered and seized.

More than 60 garda took part in a total of nine co-ordinated searches, with the assistance of the Criminal Assets Bureau, Drugs and Organised Crime Bureau and the Stolen Motor Vehicle Investigation Unit.

The Garda Air Support and officers from Revenue Customs and Excise also took part in the raids.

It is understood that property which detectives believe was stolen from addresses across the country was recovered during the investigation.

Sources say officers are now logging each of the items and hope to be able to trace the owners. A large number of CCTV videos from premises which had been targeted by the criminals are said to form part of the inquiry.



Public consultation:

### Draft National Wastewater Sludge Management Plan and Associated Environmental Reports

Irish Water is inviting feedback as part of an eight week public consultation closing on 18th May 2016.

The Draft National Wastewater Sludge Management Plan (NWSMP) outlines Irish Water's strategy to ensure a nationwide standardised approach for managing the treatment and disposal or re-use of wastewater sludge over the next 25 years.

The national approach will, for the first time, ensure that treated wastewater sludge across the country is managed in a sustainable way that will ensure efficiency and ongoing improvements to the benefit of the public and the environment we all live in.

As part of the development of the Draft NWSMP, Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) processes are being carried out in parallel, and an SEA Environmental Report and Natura Impact Statement have been prepared. The Draft NWSMP, SEA Environmental Report and Natura Impact Statement are available to view at planning counters in main Local Authority Offices, and online at [www.water.ie/wastewater-sludge-management](http://www.water.ie/wastewater-sludge-management)

Written submissions or observations can be sent to Irish Water by Wednesday 18th May 2016:

**By Email:** [nwsmp@water.ie](mailto:nwsmp@water.ie)

**Or by Post:** National Wastewater Sludge Management Plan, Irish Water, Colvill House, 24-26 Talbot Street, Dublin 1, Ireland.

Submissions will be reviewed and relevant feedback incorporated into the final NWSMP. It is expected that the final NWSMP and SEA Statement will be published in Summer 2016.

# IFA profits fall 40% due to increase

**Eoin Lowry**  
**AGRIBUSINESS EDITOR**  
 ealowry@farmersjournal.ie

The IFA has published its financial results for the year ending 31 March 2015 which show the association made a surplus (profit) of €1.2m for the 12-month period – down from over €2m the previous year. The 40% fall in profits is mainly due to an increase in the costs of running the association during the year.

Income for the 12 months fell slightly (-1%) to €12.76m, mainly as a result of a slight falloff in membership and

a reduction in income from levies collected in each sector. Just over half (€7m) of overall income is derived from fees from its 85,000 members. Thirty-seven per cent of income comes from levies and this fell by almost 2% to just under €4.7m as a direct result of falling commodity prices. Other income included €1.28m from FBD Trust, €25,000 from the Agricultural Trust and dividend income of more than €300,000 from invested shares.

IFA Telecom's profits of €488,000, which were down 23% year-on-year, also con-

tributed to the IFA's income stream.

## Expenditure

Total expenditure for the year increased 7% to €12.3m, driven by the expense of running the 2014 beef protests, which cost in the region of €150,000, and the special 90th anniversary celebrations, which cost some €300,000.

Most of the IFA's spending goes on staff costs and expenses for voluntary members. Overall staff costs increased by €90,000 to €6m, with €3.8m of this paid out in salaries to the 87 employees.

For the period, the general secretary's salary and pension amounted to €442,194, while the president's salary amounted to €147,500.

Pension costs for the year were €1.1m. Expenses for voluntary members amounted to €1.6m during the year.

Another significant expense for the association is maintaining a full-time office in Brussels, which cost just over €600,000. Affiliation fees to other associations, including Copia Copeca, cost a total of €150,000.

At year end, the net asset value of the association was €18.1m, marginally down on the preceding year. The main reason for the drop was due to the IFA taking a €4.2m write-down on its investment



While the...  
 for the...  
 March 2...  
 future fi...  
 to come...  
 output p...  
 with the...  
 So far th...  
 associat...  
 battle re...  
 secretar...  
 transpar...  
 expense

in FBD, d...  
 share pri...  
 Offsett...  
 associat...  
 value of...  
 Farm Co

Public consultation:

## Draft National Wastewater Sludge Management Plan and Associated Environmental Reports

Irish Water is inviting feedback as part of an eight week public consultation closing on 18th May 2016.

The Draft National Wastewater Sludge Management Plan (NWSMP) outlines Irish Water's strategy to ensure a nationwide standardised approach for managing the treatment and disposal or re-use of wastewater sludge over the next 25 years.

The national approach will, for the first time, ensure that treated wastewater sludge across the country is managed in a sustainable way that will ensure efficiency and ongoing improvements to the benefit of the public and the environment we all live in.

As part of the development of the Draft NWSMP, Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) processes are being carried out in parallel, and an SEA Environmental Report and Natura Impact Statement have been prepared. The Draft NWSMP, SEA Environmental Report and Natura Impact Statement are available to view at planning counters in main Local Authority Offices, and online at [www.water.ie/wastewater-sludge-management](http://www.water.ie/wastewater-sludge-management)

Written submissions or observations can be sent to Irish Water by Wednesday 18th May 2016:

**By Email:** [nwsmp@water.ie](mailto:nwsmp@water.ie)

**Or by Post:** National Wastewater Sludge Management Plan,  
 Irish Water, Colwill House, 24-26 Talbot Street,  
 Dublin 1, Ireland.

Submissions will be reviewed and relevant feedback incorporated into the final NWSMP. It is expected that the final NWSMP and SEA Statement will be published in Summer 2016.



**eagas**  
 Animal Care and Farm Development Advice  
**Breeding**  
 How close to these fertility targets?

- 365 Day Calving Interval
- 12 Week Calving Spread

**Key Points to Achieve Targets**

- A definite start and finish to the breeding season
- Maintain cows in a reasonable condition throughout the breeding season
- Ensure stock bulls are in a fit condition
- Keep records to monitor your breeding progress
- Breed enough heifers to replace culled cows
- Use restricted suckling from weaning to weaning to get cows in heat quicker

Check out HerdPlus 6

Irish Farmers' Journal advertisement, Thursday 24th March 2016

**APPENDIX B**  
**PRESS RELEASE**

## **Irish Water publishes Draft National Wastewater Sludge Management Plan**

23rd March 2016 - Irish Water will, for the first time, ensure that treated wastewater sludge across the country is managed in a sustainable way that will ensure efficiency and ongoing improvements to the benefit of the public and the environment we all live in. In its Draft National Wastewater Sludge Management Plan (NWSMP), published today, Irish Water outlines its strategy for managing wastewater sludge over the next 25 years. Public consultation on the Draft NWSMP and its associated environmental reports is now underway.

### **Public Consultation**

Public consultation will be undertaken for 8 weeks until Wednesday 18<sup>th</sup> May 2016, on the Draft NWSMP and associated environmental reports.

A hard copy of the Draft NWSMP, Strategic Environmental Assessment (SEA) Environmental Report and the Natura Impact Statement are available at planning counters in main Local Authority Offices during normal working hours. The documents are also available to download from the Irish Water website at <https://www.water.ie/projects-plans/wastewater-sludge-management/>

Comments and feedback can be sent to Irish Water by Wednesday 18<sup>th</sup> May 2016, as follows:-

**Email:** [nwsmp@water.ie](mailto:nwsmp@water.ie)

**Post: National Wastewater Sludge Management Plan, Irish Water, Colvill House, 24-26 Talbot Street, Dublin 1, Ireland**

Commenting on the publishing of the Draft NWSMP and associated environmental reports, Mr. John Casey, Head of Asset Strategy with Irish Water said, *"We would like to thank all who contributed feedback on the SEA Scoping Report, which has helped form this draft plan. We would encourage you to now have your say on the Draft NWSMP, which will ensure the effective management of sludge from the treatment of the wastewater we all create"*.

The environmental reports, which include the SEA Environmental Report and Natura Impact Statement, have been prepared as part of the Strategic Environmental Assessment and Appropriate Assessment processes on the Draft NWSMP. The aim of the SEA is to ensure that the environmental consequences of the plan and its associated actions are assessed both during their preparation and prior to adoption. This process has helped to form the Draft NWSMP.

Traditionally, the majority of Ireland's wastewater sludge is re-used as a fertiliser and soil conditioner, and also used to generate renewable energy. A very small percentage of Ireland's sludge currently goes to landfill. Irish Water aims to retain and develop these traditional outlets with full regard for food safety and the environment, through quality management and communication at all stages of the process.

All feedback received as part of this second phase of consultation will be reviewed by the project team and the issues raised will be published in the NWSMP Consultation 2 Report and will be published on the website [www.water.ie/projects-plans/wastewater-sludge-management/](http://www.water.ie/projects-plans/wastewater-sludge-management/)

Submissions from individuals will be reported anonymously in the Consultation Reports, while feedback from organisations will be attributed to them. While submissions will not be responded to individually, relevant feedback will be incorporated into the final National Wastewater Sludge Management Plan.

The SEA Statement will outline how environmental considerations have been integrated into the NWSMP and how consultation influenced the development of the NWSMP.

It is expected that the final NWSMP and SEA Statement will be published in Summer 2016.

ENDS

**APPENDIX C**  
**MEDIA COVERAGE AND MEDIA LIST**



## MEDIA COVERAGE

### 1. Irish Independent – 23.03.2016

Source: Independent.ie  
Date: 2016-03-23  
Media Type: Internet  
Title: Kenny finally promises to appoint a Cabinet Minister for Housing  
URL: <http://www.independent.ie/irish-news/election-2016/kenny-finally-promises-to-app...>  
Extraction: 1 of 2

---

## Kenny finally promises to appoint a Cabinet Minister for Housing

John Downing and Paul Melia

Published 23/03/2016 | 02:30

0 Comments [Share Facebook](#) [Twitter](#) [Google](#) [Email](#)



Mr Kenny told the Dáil he intends forming a new coalition and within three months of that he would publish a 'Housing Initiative'

Taoiseach Enda Kenny is finally promising to appoint a Cabinet Minister for Housing, if he leads the new government.

[Share Facebook](#) [Twitter](#) [Google](#) [Email](#) [Go To Comments](#)

Moving to win more support for a minority coalition, Mr Kenny has also pledged to publish a housing crisis plan within three months of taking office.

Mr Kenny said this "housing initiative" would be based on the outgoing government's jobs plan which cut unemployment. He also promised to appoint a senior minister responsible for housing issues and he urged all political parties and other interested bodies to collaborate.

"The nature of the crisis will require a collective approach and I would hope that the design of this new initiative will be informed by input from all Oireachtas members and other stakeholders interested in working for solutions," he said.



Source: Independent.ie  
Date: 2016-03-23  
Media Type: Internet  
Title: Kenny finally promises to appoint a Cabinet Minister for Housing  
URL: <http://www.independent.ie/irish-news/election-2016/kenny-finally-promises-to-app...>  
Extraction: 2 of 2

---

Fianna Fáil's environment spokesman, Barry Cowen, was scathingly critical on the outgoing administration's efforts. "This Government has failed miserably on housing," he said.

Sinn Féin TD Dessie Ellis said hundreds of families had been rendered homeless since the general election on February 26 while the bigger parties "played footsie under the table" about government formation.

Making her maiden speech in the Dáil, Fianna Fáil Kildare South TD Fiona O'Loughlin said the homeless problem was one of the biggest crises to confront the State in recent history.

Environment Minister Alan Kelly said the election was over and it was time to adopt a more cooperative approach based on facts. He said that as recently as 2012 talk was of an over-supply of housing after the property bubble.

Mr Kelly robustly defended his own party's record on housing, publishing a major plan in October 2014 with ambitious targets.

Meanwhile, despite its future being in jeopardy following the general election, Irish Water is proceeding with its expansion plans. The utility wants to spend €85m building specialist treatment centres to deal with the sludge coming from sewerage treatment plants.

A by-product of treating sewerage, sludge can contain microbiological and chemical contaminants and must be properly treated prior to disposal. Almost 900 million litres of this sludge is produced every year.

A plan to be published today, proposes upgrading 30 plants already in place to provide between 20 and 30 new facilities and develop six new larger 'sludge hub' centres.

Almost all the sludge is spread on agricultural land as fertiliser, with a small amount used to produce renewable energy.

Producing electricity would save €2.5m a year, with disposal savings of €2m.

Irish Independent



# Dempsey at large

## Food supply not a problem

As one of the largest farming conferences in the world began in Brussels on Tuesday, news filtered through of the terrorist attacks. We were told to stay in the hall. Commissioner Phil Hogan, as one of the keynote speakers, gave his speech, as did the head of the FAO and UN. The overwhelming agricultural impression I emerged with was that there is no food supply emergency in the world – now or in the foreseeable future. The director general of the FAO said “food scarcity and hunger was now confined to conflict zones”. This is a tremendous development for humankind. Instead, the emphasis is

switching to coping with climate change, emissions and changes to diets. The amount of raw calories being produced is sufficient to meet needs and, on present trends, will satisfy future demand. Figures presented at the conference showed that February 2016 had the highest increase in temperatures above the average for any month since records began. This is in world terms – there were local variations, but the trend is unmistakable. Discussions focused on two key areas: how to reduce and re-use waste and how to deal with climate change. There had been a major report produced for the conference on nutrient recovery and re-use.

At this stage, of the livestock manure produced in the community, it is reckoned about 70% of the nitrogen in the manure is recovered and re-used in agriculture. Much discussion took place on the role of sludge from cities and the report concluded that there were legitimate safety concerns on the use of sludge in agriculture, especially the potential buildup of heavy metals, pathogens and pharmaceutical products. One of the industry spokespeople outlined how phosphorus could be extracted from sludge and reformulated as a valuable industrial material. Ireland is not alone in insisting that the products produced under quality assur-

ance schemes should not be produced from land that has received sludge from cities. The key observation probably came from the vice-president of Swiss RE, the giant reinsurer, who made the point that managing risk is inevitably cheaper than the cost of a crisis. Swiss RE is wheeling out a number of high-tech farming insurance products. For example, he spoke about paying out on the basis of satellite photography showing the growth of grass in drought-prone areas. This gets over the need for individual farm inspections. From a tillage point of view, they have already implemented a system in some milling wheat areas where farmers can buy insurance that pays out in the event of a regional decline in the Hagberg falling number for milling wheat. In his address, Commissioner Hogan said that they were putting together the facts that will influence the decisions to be taken in the midterm CAP review in 2017. In particular, he will be looking to see if the greening measures implemented in the most recent reform are working but the key question of the collapse of farm income remains.

### THE HOME FARM

## Dry weather works wonders

The dry weather has worked wonders on the farm and coming up to the weekend we got the beans sown in absolutely perfect conditions. My ambition that ploughing and ring-rolling would be enough proved overly optimistic, however, and we drafted in a power harrow at short notice, direct drilled into a perfect seedbed and then ring-rolled to finish off. The end outcome has been an expensive way of establishing the crop. While we had one big field of beans, we put in a higher seed rate in a small field of oilseed rape which, because of poor establishment, I was forced to spray with Roundup and replough. The difference in yield – if there is one when the harvest eventually comes – will be an interesting lesson in how seed rate in beans affects yield. We have the 0-10-20 and the pre-emergent spray applied – that completes our spring sowing as the rest is winter cereals and oilseed rape. I still have one small field of oilseed rape which

is one of the worst crops I have ever had. There are odd plants sticking up with yellow flowers threatening to appear in full bloom while the rest of the crop has been eaten by the pigeons. It has got its 10-10-20 and will have CAN with sulphur over the next few days. All the cereals have now gotten their first 10-10-20 application. After speaking to a neighbouring tillage farmer, whom I respect hugely, I am definitely going to investigate the possibility of fertiliser placement in the autumn, at planting time. He showed me a photograph of two crops side by side: one conventionally treated with nothing in the autumn and one with the fertiliser placement at sowing. The difference at this stage of the year was real and visible, but of course the ultimate answer is in the yield figures. We continue to graze by day and apply the slurry on each paddock but the regrowths are really poor. However, this is not unusual at this time of the year.

### ADVERTISER'S ANNOUNCEMENT

# Magnum Fodder Beet: The Trusted Brand

VALUABLE ENERGY SOURCE

## MEDIA LIST

Trade Publication
Consumer Choice
Council Review
Decision Ireland
Department of the Environment
Energy & Environment Management
Engineers' Journal
Enterprise
Enviro Solutions
Eolas (Science & Technology magazine)
Farm Week
Farming Life
Irish Farmers' Monthly
Irish Farmers' Journal
Irish Farmers' Journal
Irish Franchise Magazine
Lifestyle Green
Environmental Management Ireland
Organic Matters
Peatland News
Public Affairs Ireland
Public Sector Times
Public Sector Times
Project Management
The Irish Field
Today's Farm
TResearch (Science magazine)
Science Spin
Science Spin
Sustainable Ireland
WWT Magazine (UK wastewater magazine)
Marine Times
Irish Food

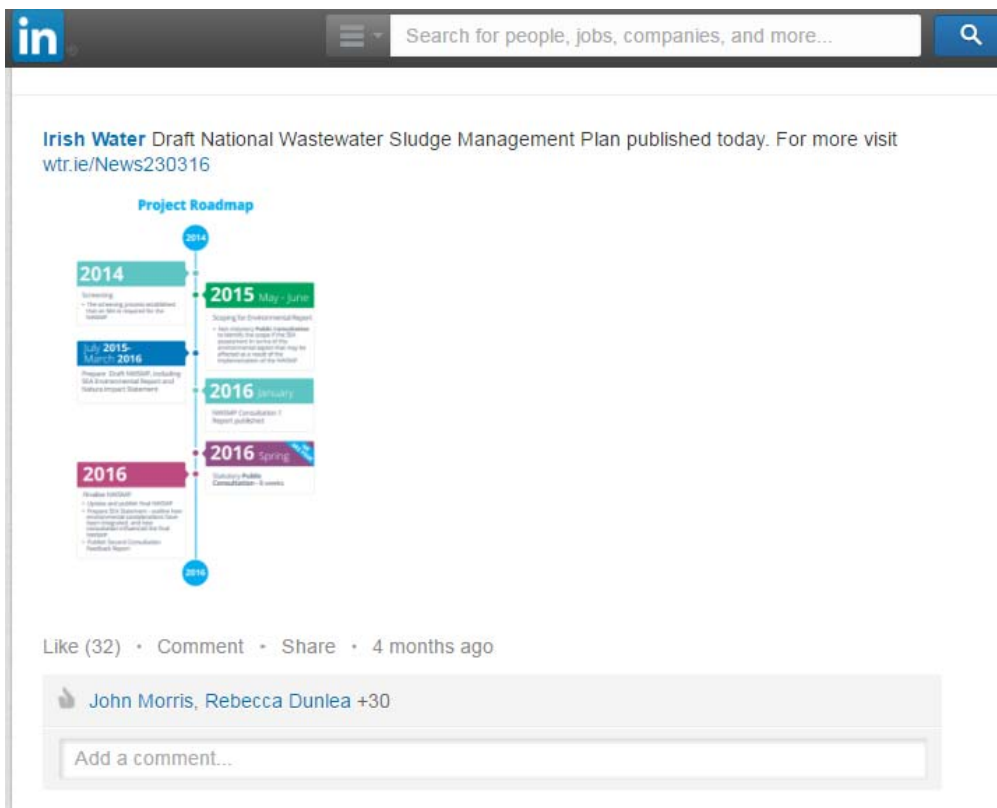
**APPENDIX D**  
**SOCIAL MEDIA**

Press Release: Draft National Wastewater Sludge Management Plan published. For more see [wtr.ie/News230316](http://wtr.ie/News230316)

9:24 AM - 23 Mar 2016



Irish Water Twitter post promoting the Draft NWSMP Consultation on 23<sup>rd</sup> March 2016.




**Irish Water** Draft National Wastewater Sludge Management Plan published today. For more visit [wtr.ie/News230316](http://wtr.ie/News230316)

**Project Roadmap**

- 2014**
  - Screening
    - The screening process established that all WWSMP required for the sector
- 2015** (May - June)
  - Drafting for Environmental Report
    - Key message: Public consultation to identify the scope of the Environmental Report and the potential for any further work that may be required as a result of the recommendations of the report
- 2015** (July - March 2016)
  - Prepare Draft NWSMP, including the Environmental Report and Public Impact Statement
- 2016** (January)
  - NWSMP Consultation 1 report published
- 2016** (Spring)
  - Consultation Public Comment 2 weeks

Like (32) • Comment • Share • 4 months ago

 John Morris, Rebecca Dunlea +30

Add a comment...

Irish Water LinkedIn update promoting the Draft NWSMP Consultation on 23<sup>rd</sup> March 2016.

**APPENDIX E**  
**BRIEFING NOTE TO INTERESTED BODIES**



23rd March 2016

**Notice of publication of the Draft National Wastewater Sludge Management Plan and associated SEA Environmental Report and Natura Impact Statement**

Dear \_\_\_\_\_ ,

Irish Water (*ref. 1 below*) would like to invite you to have your say on the Draft National Wastewater Sludge Management Plan (NWSMP), published today. The Draft NWSMP outlines Irish Water's strategy for managing wastewater sludge over the next 25 years. With this strategy Irish Water will, for the first time, ensure that treated wastewater sludge across the country is managed in a sustainable way that will ensure efficiency and ongoing improvements to the benefit of the public and the environment we all live in.

**Public consultation on the Draft NWSMP and its associated environmental reports is now underway for an eight week period, closing on 18th May 2016.**

The SEA Environmental Report and Natura Impact Statement have been prepared as part of the Strategic Environmental Assessment and Appropriate Assessment processes on the Draft NWSMP.

These reports have been developed following initial consultation, in May/June 2015, with statutory bodies, interested parties and the public. Feedback received as part of Consultation 1 has been reviewed and presented in the Consultation 1 Report available



[here](#).

Irish Water would like to thank all who contributed to this process, which has helped to form the Draft NWSMP.

A hard copy of the Draft NWSMP, Strategic Environmental Assessment (SEA) Environmental Report and the Natura Impact Statement are available at planning counters in main Local Authority Offices during normal working hours. The documents are also available to download from the Irish Water website at [www.water.ie/wastewater-sludge-management](http://www.water.ie/wastewater-sludge-management).

An information leaflet on the Draft NWSMP is available [here](#)

Written submissions or observations can be sent to Irish Water by Wednesday 18th May 2016, as follows:-

**Email:** [nwsmp@water.ie](mailto:nwsmp@water.ie)

**Post:** **National Wastewater Sludge Management Plan, Irish Water, Colvill House, 24-26 Talbot Street, Dublin 1, Ireland**


All feedback received as part of this consultation – Consultation 2 - will be reviewed by the project team and the issues raised will be published in the NWSMP Consultation 2 Report and will be published on the website [www.water.ie/wastewater-sludge-management](http://www.water.ie/wastewater-sludge-management).

Submissions from individuals will be reported anonymously in the Consultation Reports, while feedback from organisations will be attributed to them.

While submissions will not be responded to individually, relevant feedback will be incorporated into the final National Wastewater Sludge Management Plan.

It is expected that the final NWSMP and SEA Statement will be published in Summer 2016.

Yours sincerely,



---

Fiona Lane

Wastewater and Sludge Strategy Specialist

References:

(1) Irish Water is the Competent Authority for the National Wastewater Sludge Management Plan and has published these documents and is carrying out a period of formal public consultation in accordance with:

- Irish Waters National Planning Framework, the draft National Wastewater Sludge Management Plan has been published.
- EC (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. 435 of 2004 as amended in 2011), an SEA Environmental Report and non-technical summary have been prepared on the likely significant environmental effects of implementing the above draft plan.
- Article 6(3) of the Habitats Directive (92/43/ECC) a Natura Impact Statement have been prepared to ascertain if the draft plan could significantly impact on any site designated for conservation as part of the Natura 2000 network.

[Preferences](#) | [Unsubscribe](#)

## LIBRARIES WHERE NWSMP INFORMATION LEAFLETS SENT FOR DISPLAY

Library
Cork City Library
Cork County Library
Kerry County Library
Limerick City Library
Limerick County Library Headquarters
Waterford City Central Library
Waterford County Council Library Service
Tipperary Library
Galway City Library
Galway County Council - Libraries Headquarters
Clare County library
Central Library
County Library
Kilkenny County Library
Kilkenny City Library
Mayo County Library
Roscommon County Library
Leitrim County Library
Longford County Library
Westmeath County Library
Portlaoise Library
Kildare Library & Arts Service Headquarters
Meath County Library
Louth County Library
Wicklow County Library Headquarters
Sligo Central Library
Johnston Central Library H.Q
County Library
Monaghan Branch Library
South Dublin Libraries' Headquarters
Laois County Library HQ
Louth County Library
Tullamore Library

**LOCAL AUTHORITIES PLANNING DEPARTMENTS WHERE NWSMP INFORMATION LEAFLETS AND DRAFT NWSMP REPORTS AND ENVIRONMENTAL REPORTS SENT FOR DISPLAY**

<b>Local Authority</b>
Carlow County Council
Cavan County Council
Clare County Council
Cork City Council
Cork County Council
Donegal County Council
Dublin City Council
Dun Laoghaire-Rathdown County Council
Fingal County Council
Galway City Council
Galway County Council
Kerry County Council
Kildare County Council
Kilkenny County Council
Laois County Council
Leitrim County Council
Limerick City & County Council
Longford County Council
Louth County Council
Mayo County Council
Meath County Council
Monaghan County Council
Tipperary County Council
Offaly County Council
Roscommon County Council
Sligo County Council
South Dublin County Council
Waterford City and County Council
Westmeath County Council
Wexford County Council
Wicklow County Council