THIRD CYCLE DRAFT RIVER BASIN MANAGEMENT PLAN 2022-2027

Consultation Report

MDR1665
F02
12 July 2022

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
A01	Draft for Client Review	RA	AG	AG	11.05.22
A02	Final draft	RA	AG	AG	23.05.22
A03	Final draft – Water forum list update	RA	AG	AG	17.06.22
F01	Final	RA	AG	AG	21.06.22
F02	Final with Additions to Specific Requests	RA	AG	AG	12.07.22

Approval for issue

AG	AG	12 July 2022

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Prepared by:

RPS

Prepared for:

Water Advisory Unit,
Department of Housing, Local Government and Heritage

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EXECUTIVE SUMMARY

The 3rd cycle of River Basin Management Plan (RBMP) for the period of 2022-2027 is currently being prepared by Department of Housing, Local Government and Heritage (DHLGH) in line with the EU Water Framework Directive (WFD) (2000/60/EC). A 6-month long public consultation was undertaken in this regard from September 27th 2021 to March 31st 2022.

A total of 1401 submissions were received by the DHLGH through a combination of the Department's on-online survey and direct email. These submissions were initially categorised as submissions based on:

- Consultation Response Questionnaire issued by the DHLGH (161);
- Template response (original emanating from the Sustainable Water Network (SWAN), a network of environmental NGOs) (1172); and
- Individual 'free style' responses from a cross section of stakeholders (68).

Of these 259 were identified as unique content. RPS were appointed by the DHLGH to review these submissions.

The questionnaire submissions included responses to 26 questions set by the DHLGH, with responses submitted either through their online survey or by completing a template response document and sending it to the DHLGH. Each questionnaire was reviewed individually to provide a summary per question (noting not all questions were answered by all respondents) and an overall summary was then prepared for each question once all 161 submissions had been reviewed. In addition, key themes raised were noted for each submission.

The main template submission was initially reviewed for content and any variations of the template were also reviewed to identify additional issues. Key themes raised were recorded.

For the final category of "free style" each submission was further categorised as:

- Government Department/Agency/Body;
- Local Authority;
- Non Governmental Organisations (NGOs);
- Community Groups;
- Companies/Corporate;
- Public; and
- Political.

Each submission was then reviewed and summarised and key themes raised were recorded.

Thirty-eight themes were identified across the 259 submissions reviewed. Key issues raised within the ten most prominent themes are summarised below.

- **Water Quality / Pollution –** Key issues raised included the need for clear water governance and adequate investment; lack of specific measures to improve water quality in the plan; inefficient liaison with water stakeholders; transparency from authorities working in the water sector; large number of water bodies being subjected to wastewater pollution and extensive arterial drainage; lack of prosecution for defaulters and impact of water quality on public health.
- **Agricultural Practices -** Key issues raised included the lack of recognition of the conflict between agriculture and WFD targets; urgency related to nutrient pollution; need for better incentives for farmers to promote good practices; stronger enforcement; need for WFD specific

farm assessments; and the heavy reliance on Agricultural Sustainability Support and Advisory Programme (ASSAP).

- **Public Engagement and Awareness -** Key issues raised included the inadequate public participation measures in the plan; need for a comprehensive, transparent, and participative public engagement programme; role for citizen science programmes and community involvement with provision of appropriate funding for same; and the need for simple and effective complaints channel for the public to report any pollution event. The importance of education in relation to water quality, agricultural practices, and invasive species was also raised in submissions.
- **Local Authority -** A lot of issues were highlighted in relation to the Local Authorities including lack of funding; lack of adequate resourcing; availability of training to deliver necessary measures; role of Local Authorities to sustain, drive, fund, and coordinate community involvement; development and implementation of the proposed catchment management plans.
- **Level of ambition -** The key issues raised on this issue in the submissions was that the level of ambitions in the plan is considered inadequate. It was noted that there is a need for measures to be more targeted, measurable, timebound and based on more Key Performance Indicators (KPIs). More focussed targeted climate change measures dealing with flooding, sea level rise and storage/reservoirs along with coastal specific measures were also recommended.
- **Sewage Pollution -** Key issues raised included the onerous and strict nature of the grant application process for domestic waste water treatment system (DWWTS); more investment and inspectors for proper inspection of all the malfunctioning DWWT setups; the need for the Irish Water Investment Plan to end sewage pollution from all the waste water treatment plants identified as the main pollution source; and the urgent need for upgrade or replacement of specific WWTP was noted.
- **Department / Agency –** Key issues included the need for every department/agency to carry out an internal review in respect of its role under the RBMP; the RBMP must ensure that a joined-up approach is taken to the preservation of water quality and waste water management; a single lead agency must be identified and resourced adequately to monitor and uphold key performance metrics for successful implementation of the plan.
- **Co-ordination -** Key issues were the need for greater coordination among the implementation bodies in particular Local Authorities and the Department of Agriculture, Food and the Marine (DAFM); the imperative of policy coherence between water, climate and biodiversity plans and measures; clarity on the responsibilities of different stakeholders towards the improvement of water quality; requirement for a strong collaborative approach; and the need to work positively with the farming sector to deliver improvements in water quality.
- **Funding –** References were related to the significant need for appropriate funding and resourcing to deliver necessary measures.
- **Forestry –** Key issues included the requirement for WFD specific assessment and site-specific conditions for all planting and felling licences in the forestry sector.
- **Peat –** Requirement for a list of all waterbodies that have been impacted by peat extraction to eb included in the plan, need for peat-specific targets, prohibition of wetland drainage, need for a National Wetland Restoration Plan; and incentives and grants to support such measures.
- **Shellfish waters / aquaculture -** Better integration for shellfish waters / aquaculture in the plan; need for all potential pressures from aquaculture to be included in the plan and need for effective monitoring to be put in place.
- **Other -** Requirement of restoration programme including re-meandering, re-establishment of natural riparian zones etc.; urgency to halt the release of hazardous substances into

waterbodies; constant need for compliance assurance and need for proper monitoring to track the progress of plan implementation etc.

Following review of the submissions, the DHLGH will commence a review and where necessary update the draft RBMP with a view to finalisation and publication in Q3/Q4 of 2022. The SEA and AA processes will continue in parallel until finalisation and will be completed prior to adoption of the 3rd cycle plan.

1 INTRODUCTION

1.1 Introduction

As the Water Framework Directive (WFD) (2000/60/EC) and the Strategic Environmental Assessment (SEA) Directive (2001/42/EC) both have a requirement for statutory public consultation, a single public consultation process was facilitated by the Department of Housing, Local Government and Heritage (DHLGH) on the draft 3rd Cycle River Basin Management Plan (RBMP) 2022-2027 and the associated SEA Environmental Report. The consultation ran from September 27th, 2021, to March 31st, 2022, covering a 6-month consultation period.

RPS were appointed by the DHLGH to review the unique submissions received and to compile a consultation report to inform amendments to the draft 3rd Cycle RBMP 2022-2027, prior to finalisation.

1.2 Layout of Report

This report presents a summary of the issues raised in the submissions reviewed. The summaries are supported by more detail appendices which identify the individual issues contained within the unique submission. Chapters are laid out as follows:

Chapter 2 – Analysis of Submissions Received

Chapter 3 – Department Consultation Questionnaire Responses.

Chapter 4 –Template Submissions.

Chapter 5 – Individual 'Free Style' Submissions.

Chapter 6 – Specific Requests.

Appendix A – Department Questionnaire and Response Detail.

Appendix B –Template Submission Format.

1.3 Overview of Submissions Received

During the public consultation period, **1401** individual submissions were received by the DHLGH. These submissions consisted of the following broad categories:

1. Submissions based on a Consultation Response Questionnaire issued by the DHLGH (161).
2. Submissions based on a template response (original emanating from the Sustainable Water Network (SWAN), a network of environmental NGOs (1172); and
3. Submissions based on individual 'free style' responses from a cross section of stakeholders (68).

Of the 1401 submissions received by the DHLGH, **259** were identified by the Department as unique submissions (i.e., excluding duplicates and template repeats). These submissions were issued to RPS (redacted) along with a submissions register. All 259 submissions were reviewed, identifying key themes, summarising main points raised and recording specific change requests relating to the documentation.

The information and views included in this consultation report represent the views and submissions provided by stakeholders. Information is reported as it was provided by stakeholders in their public consultation responses, some of which is subject to verification by the DHLGH.

2 ANALYSIS OF SUBMISSIONS RECEIVED

2.1 Themes Raised

As the submissions were reviewed, a key themes list was developed to identify recurring issues and the scope of concerns raised by stakeholders. The full list of themes identified following the review of all 259 submissions is presented below. The top ten themes that were raised across the submissions are presented below in **Figure 2-1**.

- Water Quality/ Pollution
- Biodiversity Management
- Flooding
- Forestry
- Hydro morphology
- Recreation
- Agricultural practices
- Invasive Alien Species
- Heritage
- Peat
- Mines and Quarries
- Industry related
- Department/ Agency related
- Local Authority related
- Funding/ Resourcing
- Consultation process
- Land use planning
- Level of ambition
- Policy Regulation and Enforcement
- Affordability and Prioritization
- Abstraction and Flow
- Climate
- Coordination of plan implementation
- Education and/or training
- Hazardous chemical
- Water and health
- Public engagement/ awareness
- Wetland drainage
- Sewage pollution
- Coastal Protection
- Policy Coherence
- Water Governance
- Data sharing
- SDGs and Nature Based Solutions
- Transboundary concerns
- Legislations
- Aquaculture/ Fisheries
- Physical elements

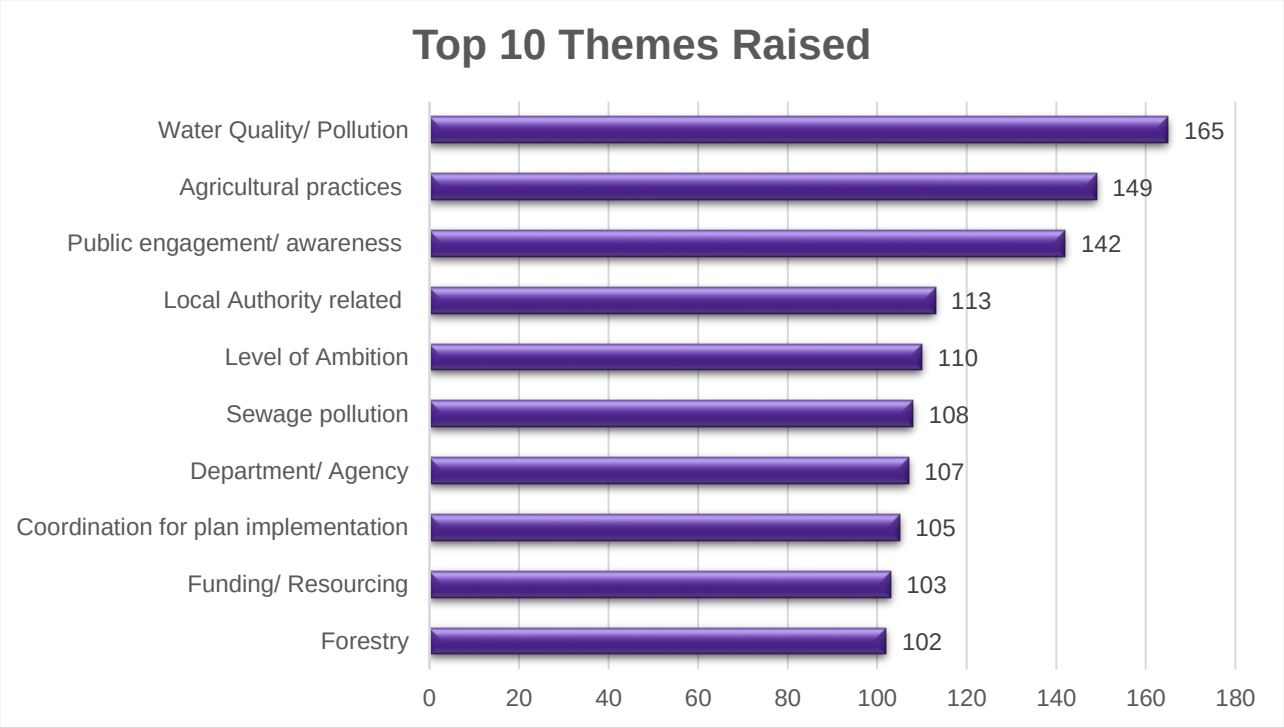

Figure 2-1: Top Ten Themes Raised Across Submissions [based on 259 unique submissions sent to RPS]

2.2 Stakeholders Represented

The sector/group to which the online questionnaire respondents associated with is presented in below in **Figure 2-2**.

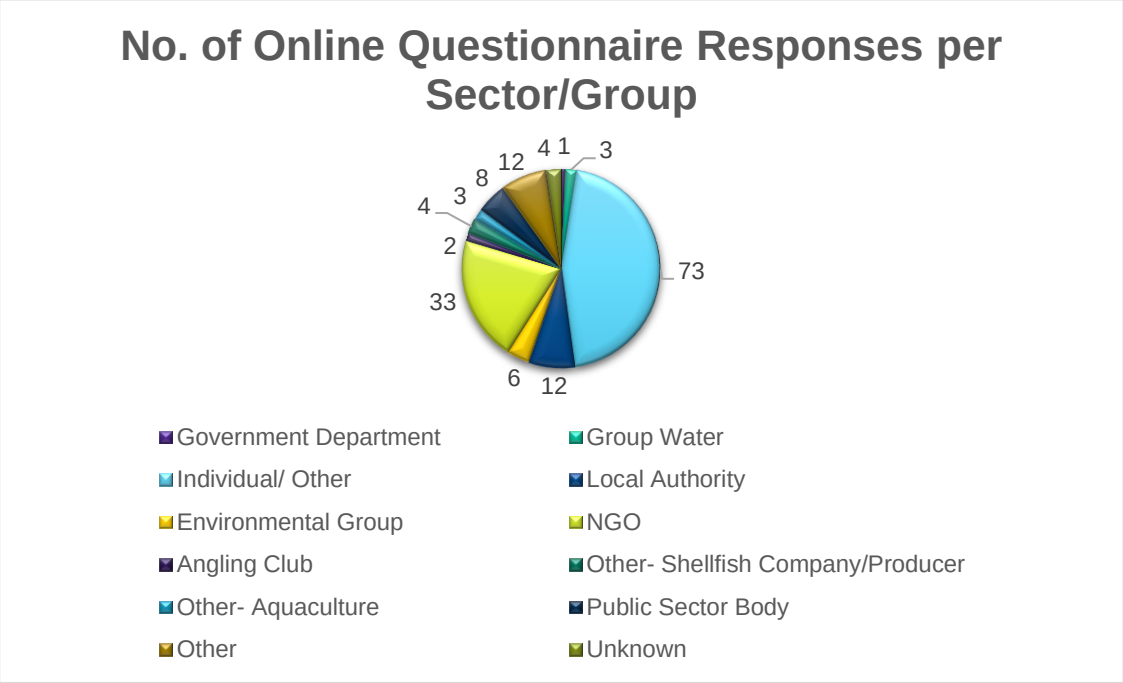

Figure 2-2 Breakdown of the Sector/Groups for Respondents of Online Questionnaire [based on 161 submissions sent to RPS]

The freestyle submissions received were categorised into stakeholder groups prior to review to allow common themes to be identified across groups. The groups identified are listed below and presented in **Figure 2.2**.

- Government Department/Agency/Body.
- Local Authority.
- Non-Governmental Organisations (NGOs).
- Community Groups/Associations.
- Company.
- Corporate.
- Members of Public.
- Political Party.

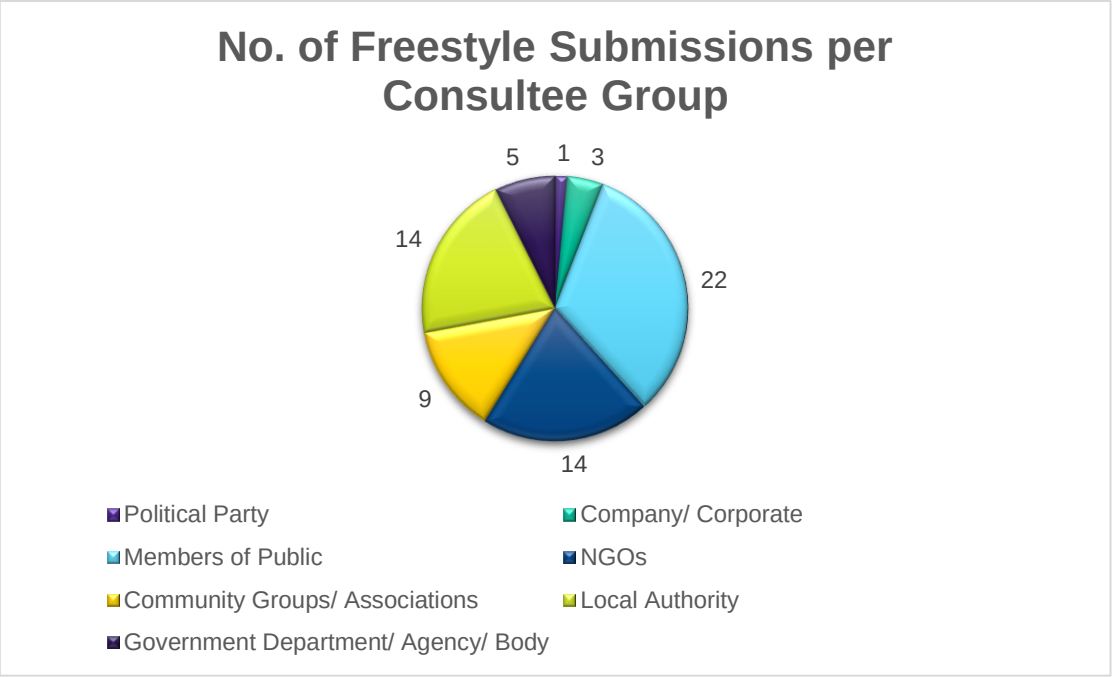

Figure 2.1: Break Down of Consultee Groups for Freestyle Submissions [based on 68 submissions sent to RPS]

Of the 30 template submissions sent to RPS for review, 25 were from members of the public, 4 were from community groups/associations and 1 was from a campaign.

2.3 Questionnaire Demographics

The Consultation Response Questionnaire included a number of demographics questions to provide an overview of information on gender, age, location and respondents primary source of information on water issues. This information is depicted in **Figure 2.3 to 2.6**[1].

Gender

The breakdown of gender was reported as 81 Male, 55 Female, 9 responding as prefer not to say and other with the remaining 16 left blank.

[1] The representation is based on the 161 submissions (responses to online questionnaire) sent to RPS.

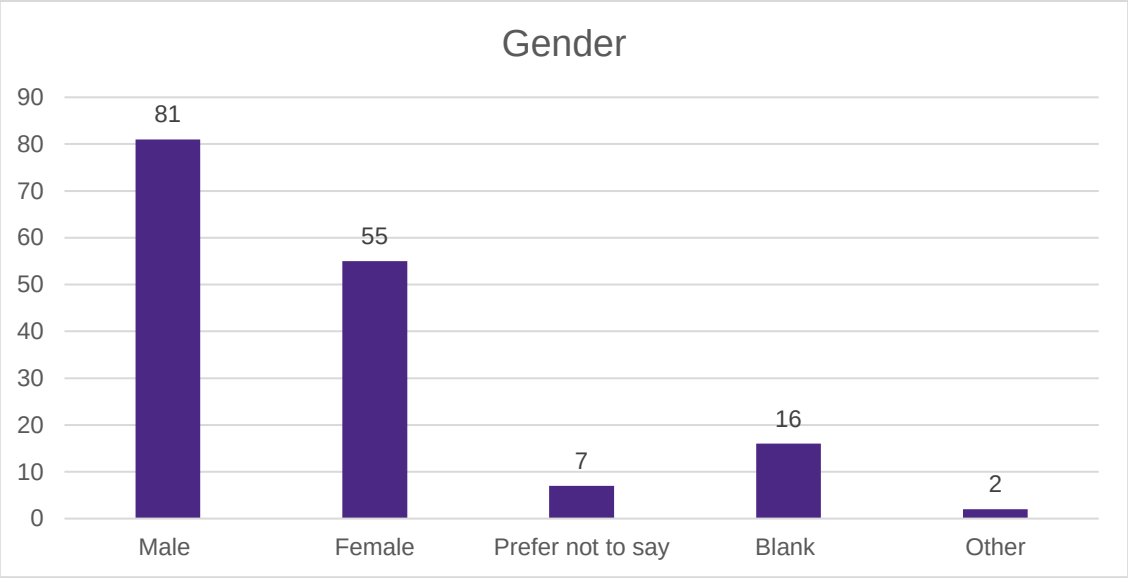

Figure 2.2: Gender Reported by Respondents in DHLGH Questionnaire.

Age

The breakdown of age of respondents was reported under the different age categories presented in **Figure 2.4**[2]:

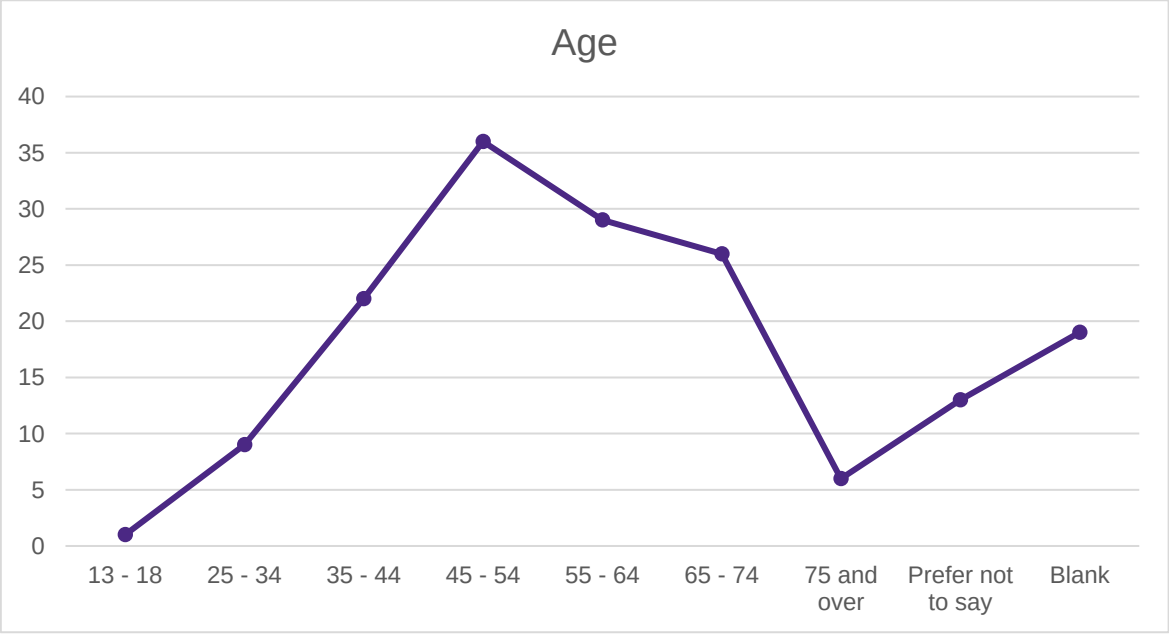

Figure 2.3: Age Profile of Respondents in DHLGH Questionnaire

[2] Note that there was no respondent from the age group 18-24 for the online questionnaire. However, one submission was noted for the age group 13-18.

Regional Distribution

The regional split of respondents to the DHLGH online questionnaire is presented in **Figure 2.5**.

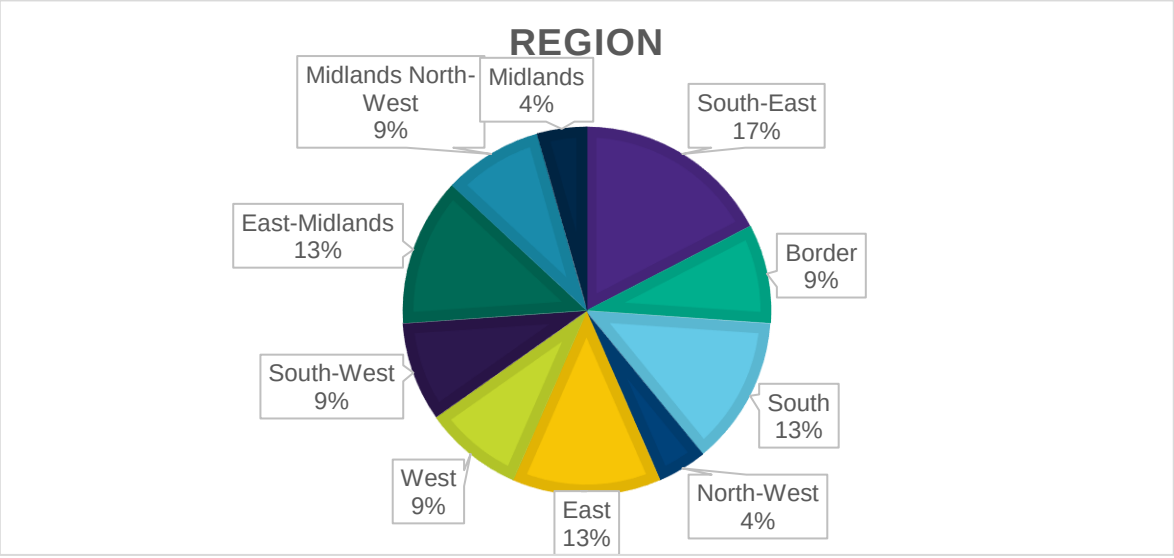

Figure 2.4: Regional Distribution of Respondents in DHLGH Questionnaire.

Sources of Information on Water Issues

A number of sources of information on water issues were listed by the respondents to the questionnaire. Several featured prominently, notably: www.catchments.ie; LAWPRO; EPA; Irish Water. Others such as SWAN were also noted in some submissions. The breakdown is presented below. Note a number of submissions listed more than one source.

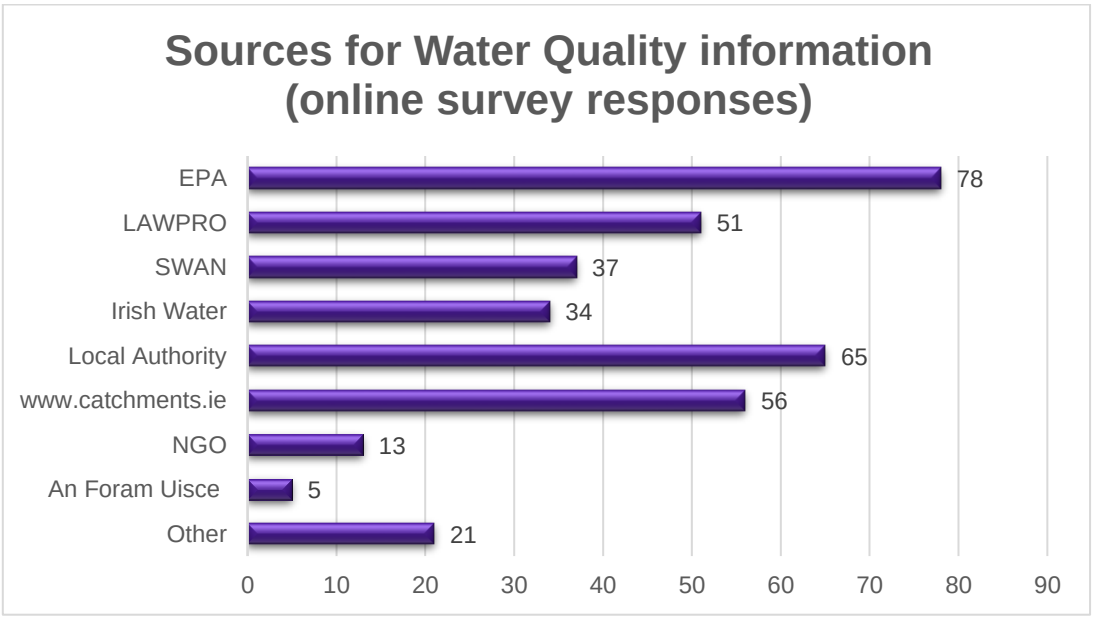

Figure 2.5: Sources for Water Quality Information of Respondents in DHLGH Questionnaire.

3 DEPARTMENT CONSULTATION QUESTIONNAIRE RESPONSES

To support the statutory consultation activities associated with the draft third cycle of River Basin Management Plan 2022-2027, the DHLGH provided a questionnaire to help both the consultation response and evaluation process.

Respondents were asked to follow the response template which included a section on Respondent Profile (see section 2) followed by twenty-six questions related to key aspects of the draft plan but were not required to provide responses to all the questions. Respondents were also invited to supplement their responses with any relevant information, reports and/or analysis.

A copy of the questionnaire is presented in **Appendix A** to this report and the 26 questions posed are stated below in Table 3-1: Survey Questions Based on Different Sections of Draft RBMP 2022**Table - 1**. Further detailed analysis of the issues raised by the submission is available to the Department.

In total there were 161 submissions made using the consultation response questionnaire. The responses were submitted online (77) or sent in the PDF format via email (84) to the Department. A brief summary of the issues raised across these submissions is provided in Section 3.1 below.

Table 3-1: Survey Questions Based on Different Sections of Draft RBMP 2022

Relevant Section of Draft Plan	Questions Asked
Section 2.3- What we want to achieve	What are your views on the proposed themes and the key actions for delivering an increased level of ambition for the third River Basin Management Plan?
Section 3.3- Artificial and heavily modified water bodies	What are your initial impressions in terms of water quality when you hear a water body described as artificial or heavily modified?
Section 3.4 – Impacts of Climate Change	What are your views on the proposed measures outlined within the draft plan in relation to climate change?
Section 4 – Implementation of Second Cycle Plan	What are your views on the progress achieved to date under the second-cycle River Basin Management Plan?
Section 5.3.1 – Implementation / Governance	What are your views on the actions included in the draft plan to improve the governance structures for the management of our waters?
Section 5.3.2 – Areas for Action	What are your views on the approach taken to the selection of areas for action in the draft plan?
Section 5.3.2 – Areas for Action and Appendix 3	What are your views on the list of proposed Areas for Action that is included in the draft plan?
Section 5.3.3 – Public Participation	What are your views on the measures included to improve the level of public participation during the third plan?
Section 5.4.1 - Agriculture and water quality management	What are your views on the measures outlined in the draft plan to address the pressures from agriculture on water quality?
Section 5.4.2 - Natural Rivers and Lakes and River Restoration – Hydro morphology	What are your views on the development of a new Controlled Activities for the Protection of Waters regime to address pressures on the physical condition of waters? What are your views on the establishment of a restoration programme to mitigate the negative impact of past construction in or near water bodies?

Relevant Section of Draft Plan	Questions Asked
Section 5.4.3- Forestry	What are your views on the issue of forestry and the proposed measures outlined within the draft plan?
Section 5.4.4 - Urban Wastewater	What do you think should be the main focus of work during Irish Water's next investment period (2025-2029)?
Section 5.4.5 - Urban Runoff Pressures	What are your views on the issue of urban runoff pressures and the proposed measures outlined within the draft plan?
Section 5.4.6 - Domestic Wastewater Discharges	What do you think are the main barriers to people accessing the grants available to upgrade domestic wastewater treatment systems?
Section 5.4.7 - Unknown Pressures	How can local communities help with the identification of significant pressures on water bodies with unknown pressures?
Section 5.4.8 - Other Pressures	What are your views on the issue of other pressures and the proposed measures outlined within the draft plan?
Section 5.4.9 – Peat	What are your views on the proposed measures outlined within the draft plan to address the impacts of peat on water quality?
Section 5.4.10 - Industry, Mines and Quarries	What are your views on industry, mines and quarries and the proposed measures outlined within the draft plan to address their impact on water quality?
Section 5.4.11 - Drinking Water Source Protection	What needs to be considered when making recommendations on the new approach to drinking water source protection as part of the transposition of the recast Drinking Water Directive?
Section 5.4.12 - Invasive Alien Species	What are your views on the measures proposed for tackle the issue of invasive alien species?
Section 5.4.13 - Hazardous Chemicals in the Aquatic Environment	What are your views on the issue of hazardous chemicals and the measures outlined within the draft plan?
Section 5.4.14 – Aquaculture	What opportunities would you suggest to strengthen the links between the Aquaculture licensing process and the objectives of the Water Framework Directive? What are your views on the process identified to implement a new legislative and management framework for shellfish waters in Ireland?
Section 5.4.15 - Land Use Planning	What are your views on the measures proposed in the draft plan to address issues relating to land use planning?
Section 5.5 – Update and Review of the Economic Analysis	What are your views on the economic analysis proposed and the measures outlined under this section?

3.1 Summary of the Responses Received

Overall, there is a sense that the Plan lacks ambition and urgency to deal with current issues raised. A more streamlined governance structure with clear actions and targeted measures is sought by respondents. Meaningful public participation is constantly needed, with education and

outreach programmes welcomed. All new licensing and planning permissions need to be aligned with national biodiversity management plans. A more detailed summary of the responses to the specific questions are as follows:

1) What are your views on the proposed themes and the key actions for delivering an increased level of ambition for the third river basin management plan?

Overall, the Plan lacks ambition, fails to set out how restoration will happen, who will enforce it, where funding will come from or how much. Must be more ambitious and reach the 2027 deadline. Over half of waterbodies are failing WFD, restoration measures listed are vague with only slight changes. Additional themes should be included such as unassigned water bodies, assigned status and transitional and coastal water management.

Recommendations within Submissions:

1) The RBMP must include a full set of targeted measures, linked to pressures, necessary for every waterbody to achieve WFD objectives of at least good status by 2027, with no deterioration. These actions must be specific, measurable and time-bound, with the responsible body assigned and accountable.

2) What are your initial impressions in terms of water quality when you hear a water body described as artificial or heavily modified?

While the majority provided no comment, a number indicated that initial impressions are generally that they are highly polluted and of poor water quality in artificial or heavily modified waterbodies and that they cannot achieve restoration or good ecological status unless they are naturalised in some way. These waterbodies are contentious as they are in use for water storage, transport, electricity generation etc. so a balance is required between the benefits of the uses of the waterbodies and restoration. Clean water is needed for drinking etc so difficult to see where there will be ecological benefit.

3) What are your views on the proposed measures outlined within the draft plan in relation to climate change?

Flood mitigation and sea level rise should be addressed, reservoir capacity and storage should also be increased. Climate change should also be added to the remit of LAWPRO, ASSAP, scientist and community officers. Overall, the measures in the plan are not ambitious enough.

Recommendations within Submissions:

1) Additional and more targeted measures should be included within the Plan. Monitoring programme has to be more specific.
2) All proposed measures in the Plan should be ‘climate proofed’ under a range of emissions climate and emissions scenarios out to 4°C warming.
3) The use of nature-based solutions should be increased within proposed measures throughout the Plan to increase climate resilience. Nature based solutions e.g., regenerative farming should be adequately resourced and given statutory footing in relevant legislation.
4) Restoration targets and measures for depleted habitats should also be included.

4) What are your views on the progress achieved to date under the second-cycle River Basin Management Plan?

Slow progress to date and a lack of transparency. Damaging conflicting policy and lack of funding for both enforcement and environmental officers has hampered efforts. Current plan has no clear KPIs, governance is unclear (who is meant to be in charge/ responsible for enforcement) , data is incomplete and not retained in a format that allows meaningful analysis, link between licenses and monitoring not clear, water related data collected in 2nd cycle remains unpublished, enforcement date difficult to locate even using FOI/AIE.

5) What are your views on the actions included in the draft plan to improve the governance structures for the management of our waters?

Currently it is reporting for the sake of reporting. Water governance in Ireland has been and is fragmented, far short on enforcement and too many committees. A governance structure where there are liaisons with the water user (industry, agriculture, Irish water etc.) to ensure compliance is necessary. Care must be taken not to create all new committees, but to build an effective structure where communication and measurable outcomes are the main objectives. All water bodies need to be considered as there are cumulative impacts to consider.

Recommendations within Submissions:

1) Water governance must be made transparent and participative and must be brought into compliance with the Aarhus Convention . The make-up and work of WPAC etc. must be readily accessible, including where water management decisions are being made.
2) The public must be involved from the start in the development of action plans for their local waters through the 46 nationwide Catchment Management Plans. This process must have expert facilitation, with catchment groups resourced to ensure effectiveness, equity and inclusiveness. The fragmented water governance system must also be fixed with a consolidated Water Act, similar to the Climate Act, with budgets, timelines and sanctions in order to mainstream water protection in government policy alongside climate and biodiversity action.

6) What are your views on the approach taken to the selection of areas for action in the draft plan? What action will actually be taken?

Currently the impression is that the Plan is not compliant with the WFD. It lacks clear funding to monitor therefore progress is hampered. What is required is an urgent overhaul of licences issuesd by the EPA that discharge directly or indirectly into the estuary shellfish designated waterbody. Stakeholders need more access to decision making. The selection process for the prioritisation process isn't clear, majority are not in favour of this process. The delineation of transitional/coastal inaccurate, indicating a worse waterbody status for areas that are primarily shellfish waterbodies.

7) What are your views on the list of proposed Areas for Action that is included in the draft plan?

Overall, there are concerns about lack of transparency and ambition in the plan. It is not clear how unhealthy/at risk waterbodies will be restored/protected. The lack of clear lines of reporting, enforcement and funding are of serious concern. Measures must be specific, measurable and time-bound with a responsible body assigned and accountable

It has been suggested that all responsibility for water quality should be with EPA as LAWPRO are not an enforcement agency therefore cannot take responsibility for actions within a given catchment area. LA and NFGWs are not resourced to take actions in a catchment, at the moment legislation is not enforceable in a consistent fashion.

Recommendations within Submissions:

1) In particular relation to shellfish producers, they are recommending that UV treatment for all major outfalls/overflow points for human sewage should be installed along with SCADA monitoring on all sewage overflows. The data should be made available to the public.
2) Greater enforcement on slurry practices (illegal) an action taken on illegal developments that have associated human sewage discharges should be immediately dealt with.

8) What are your views on the measures included to improve the level of public participation during the third plan?

Public Participation measures proposed in the plan are inadequate. WFD implementation must be made transparent and participative including making it clear where water management decisions are being made. Public must be involved from the start. A comprehensive programme for public engagement in RBMP needs to be developed to get the public to actively engage. Capacity building and increased funding are vital in order to achieve this.

Key stakeholders such as shellfish businesses should be included in the decision-making process of any plan/project/licence application from the very beginning and no plan/project that has the potential to add extra pressure to the already deteriorating waterbody should not be allowed. Cumulative impacts must at all times be assessed.

Recommendations within Submissions:

1) WFD implementation must be made transparent and participative and must be brought into compliance with the Aarhus Convention.
2) The public must be involved from the start in the development of action plans to ensure effectiveness, equity and inclusiveness.
3) The Department of Housing must publish a comprehensive programme for public engagement in the RBMP process.
4) Suggest that an online portal be established to allow local stakeholders to make submissions to regulators in relation to abuses of waterbodies witnessed and breaches of legislation.
5) A key recommendation would be to tie in water quality to Biodiversity in the plan, as this is more tangible to the public and more evocative.
6) Also recommended that a standardised simple water quality sign or ‘badge’ for each bridge in our towns to raise awareness of quality and what is acceptable for the plan. Similar to blue flag system for beaches.

9) What are your views on the measures outlined in the draft plan to address the pressures from agriculture on water quality?

Plan is too weak and lack urgency on nutrient pollution. There is no clear plan on how to tackle the policy conflict between agriculture and WFD targets. There are no additional systemic measures beyond what's already in place and the plan relies heavily on voluntary monitoring and reporting.

There is need for more work to be carried out directly in local areas. Appropriate and frequent communication with farmers and the IFA throughout the development and implementation of the proposed measured is essential. Incentives should also be provided to farmers to promote good practices in tandem with stronger enforcement for those flouting the law and causing pollution. Innovative solutions for the processing and disposal of animal waste needed. We now have the information to move away from a one-size fits all or three zone model for Nitrate Vulnerable Zones (NVZs), and this should be used in conjunction with agricultural advisors to improve environmental outcomes and make savings for farmers.

Recommendations within Submissions:

1) To introduce WFD specific risk assessments for all intensive farms.
2) Derogation stocking rates should only be permitted if it can demonstrate no impact on WFD objectives, for at risk farms regulatory voluntary and combined measure should be implemented.
3) Certain sub catchments should be zoned ineligible for stocking rates based on catchment carrying capacity,
4) Certain sub-catchments should be zoned ineligible for certain stocking rates,
5) Existing drainage ditches and channels directly linked to rivers should be vegetated and mechanisms installed to slow water ingress to rivers.
6) Upland management must include preservation of natural vegetation and water retention must be prioritized through preservation of blanket bogs.
7) Machinery operators should be prioritized for education on protection for water courses during agricultural works. Operators should be liable for damage to water quality and integrity of riverbanks.

10) What are your views on the development of a new Controlled Activities for the Protection of Waters regime to address pressures on the physical condition of waters?

The Draft Plan does not acknowledge the severe and extensive damage caused to rivers by arterial drainage nor include any measures to address this. This iteration of the plan must be developed in adherence with the WFD and must be given effective powers to enable enforcement. The plan should also include a commitment to national wetland restoration and a review of the Arterial Drainage Act 1945 to bring it into compliance with EU law. There needs to be clarity on defining controlled activities and information on landowners' responsibilities/prohibited activities clearly defined and made available.

Recommendations within Submissions:

1) A WFD-specific assessment in advance of developments potentially impacting waterbodies e.g., dredging; drainage; flood protection. Projects can only go ahead if it can be demonstrated that WFD objectives will not be compromised.
2) A prohibition on wetland drainage and commitment to a national wetland restoration programme.
3) A review of the impacts of arterial drainage; and a commitment to review and amend the Arterial Drainage Act 1945 to remove the requirement to maintain drainage and to bring it into compliance with EU environmental law.
4) Full integration of water management in the upcoming Land Use Plan committed to by government, so that catchment- and nature-based approaches are central to it.
5) Licenced Dredging activities (in particular plow dredging in shellfish areas) needs to be reviewed as it has a proven detrimental impact on shellfish health, quality, disease risk and mortality rates.

11) What are your views on the establishment of a restoration programme to mitigate the negative impact of past construction in or near water bodies?

River restoration is desirable, but in the context of meeting WFD requirements in line with other user objectives. The implications of all activities – not just on the direct location of the modifications must be considered. Flowing waters are connected with upland and lowland implications.

What will the costs be? A natural capital approach will demonstrate these costs and benefits very clearly. Has a list of areas for action been compiled and will this be available for public

consultation? Responsibility shouldn't fall to the OPW only it should be collaborative among NPWS, EPA and IFI for monitoring and managing.

Recommendations within Submissions:

1) Restoration programme should include re-meandering, reestablishment of natural riparian zones and adjoining wetlands, reconnecting rivers with their floodplains, coastal wetlands and a management plan incorporated into any plan.

12) What are your views on the issue of forestry and the proposed measures outlined within the draft plan?

There will be no decrease in damage from forestry until site specific conservation objectives (CO) for the restoration of catchment hydrological function are followed, and Forest Plans for Freshwater pearl mussels (FPM) catchments changed accordingly. Training should be provided for all licensed forestry workers to implement the most up to date and best practices. Forest to bog restoration where catchment flows are inadequate in the most important high status FPM populations needs to be acknowledged and included. Additional measures are needed in the Plan to address imminent pressure from felling and planting-doesn't propose measures to address forestry impacts on waterbodies and at risk FPM

Forestry is having the most significant negative impact on high water status.

Recommendations within Submissions:

1) All planting and felling licences to include WFD specific assessment and site-specific conditions for water protection, introduce prohibition on afforestation on peat solid in acid sensitive head water catchments.

13) What do you think should be the main focus of work during Irish Water's next investment period (2025-2029)?

The Plan is not strong enough in addressing sewage pollution. The Plan must include necessary work to halt sewage pollution from all wastewater treatment plants into watercourses. All identified urban waste water pollution pressures from smaller discharges and sewer overflows must also be set out with a programme of measures to fix them. There is no indication of the percentage that need upgrades, this should be a priority. A programme for addressing pollution from Combined Sewer Overflows with a timeline and budget must be developed.

Irish Water (IW) need to install UV treatment and SCADA monitors at all overflow pipes to establish overflow volume and duration for all agglomerations. Report this data publicly and invest in actions that drastically reduce the level of sewage overflows.

Some additional attention should also be given to addressing issues such as unfinished estates and abandoned privately developed wastewater services. A site-specific review is suggested as a means to determine if they can be integrated within existing networks to resolve ongoing issues. Additional financial resource should be provided to address these issues

The country's cumbersome planning consents and judicial review regime is likely to impact adversely on numerous waste water treatment projects that Irish Water is progressing. The process of obtaining an abstraction licence, followed by the planning consent process, and the likelihood of multiple legal challenges, is likely to result in very lengthy delays

Recommendations within Submissions:

1) Address the extraordinarily high of leaks in the water distribution system, far in excess of European norms, and carry out work to reduce leakage to around 20 %.

2) Encourage water conservation and demand reduction.

3) Encourage rainwater harvesting and use of rainwater, as a means of easing pressure on other water sources.
4) Encourage the installation of water meters in as many premises as possible, including domestic dwellings, in order to provide an indication of water use and water loss,
5) Require all new buildings to install urine separation toilets, and to arrange to have urine collected for its valuable phosphorus content, so that the phosphorus can be returned to its use as fertiliser.
6) Change completely the attitude of providing as little information as possible about the company's activities; become open, informative and transparent to water users and customers, with the intention of regaining some of the public confidence which it has lost in the previous decade.

Q14: What are your views on the issue of urban runoff pressures and the proposed measures outlined within the draft plan?

Urgent action and more efforts are needed to slow the flow of storm water drains into local rivers. Integration of Sustainable Urban Drainage Systems (SUDS) is welcomed but needs to be properly implemented. Councils need to be educated on the importance of clean waterways.

Run off will add additional nutrients and chemicals into areas close to shellfish production areas in transitional water bodies. Focus should be on natural holding environments relieving the pressure of sewage collection systems for agglomerations.

Recommendations within Submissions:

1) Irish Water's Investment Programme must include necessary work to halt sewage pollution from all waste water treatment plants,
2) Programme of measures to fix all other identified urban waste water pollution.
3) Address pollution from combine sewer overflows including a pollution alert system for public.
4) The use of natural integrated waste water systems should be encouraged in smaller villages to alleviate pressure on receiving waters.

Q15: What do you think are the main barriers to people accessing the grants available to upgrade domestic wastewater treatment systems (DWWTS)?

The need for a tank to be historically registered for it to be eligible for grant availability is viewed as a barrier (pre-2013). The grant process is onerous and it is not clear how it is determined if a DWWTS needs to be upgraded and who is qualified to make that assessment? There is a lack of awareness regarding their availability and education around the impact malfunctioning DWWTS has on the environment (water quality) and potentially on human health, operational and maintenance. More investment and more inspectors are urgently needed for more septic tank inspections. Irish Water is supportive of grants being made available to help householders to upgrade and repair domestic wastewater systems. Irish Water would like to see the grants extended to drinking water abstraction catchments where such discharges have been identified as a risk to drinking water sources.

Recommendations within Submissions:

1) The RBMP should set out specific measures to restore the 188 waterbodies "that have a significant impact from domestic wastewater".

Q16: How can local communities help with the identification of significant pressures on water bodies with unknown pressures?

Citizen science programme will help educate people about this but there is a need for paid local coordinators to support, motivate, recruit and resource volunteers. Monitoring results should be made available to the public. Training is needed for all stakeholders and appropriate reporting mechanisms should be in place. Local authorities need to be involved to sustain, drive, fund and coordinate community involvement. Increase levels of Public/Community Engagement initiatives to include higher level Basic/Lay Aquatic Education, thus empowering people to participate in practical Local management and governance.

Geolocated photos could be uploaded with short descriptions in a "See it, Say it' type of App. The current Apps available are in need up a major upgrade, with Fixmystreet not currently working with more recent operating systems.

EPA pollution hotline on all government and local government website homepages is difficult to find on EPA website, publish monthly/quarterly reports. There needs to be a funded catchment non-government individual or organisation who has responsibility to coordinate and report on activities which may have an impact on water quality.

Q17: What are your views on the issue of other pressures and the proposed measures outlined within the draft plan?

The measures are deficient, and remedies are inadequate. A standalone chapter should be created for coastal and transitional issues within the final Plan identifying the pressures specific to coastal waterbodies including targeted measures to address them: fishing, offshore renewables, shipping, seaweed harvesting and any other activity with negative impact, and establish priority habitat restoration zones.

Irish Water would welcome clarity on the water bodies considered to be a risk of deterioration due to abstraction pressures.

Granting Planning and Licences without the environmental consequences accumulative effects being considered along with progressing plans and projects that do not comply with EU directives will add further water pressures to an already dire situation.

Other significant pressures include peatland drainage, peat extraction, unmonitored silt/settlement ponds, licensed/unlicensed quarries, landfills illegal dumps, fisheries related dredging, agri burning and inappropriate freshwater aquaculture licenses.

Shellfish help mitigate against eutrophication and help in removing Nitrogen (N) and Phosphorus (P) from water column naturally. Given the WFD status of the transitional water body it is important that shellfish are afforded greater protection. See the Tribeca Habitat Enhancement project oysters used to clean waters of Hudson River.

Q18: What are your views on the proposed measures outlined within the draft plan to address the impacts of peat on water quality?

The proposed measures are inadequate and lack specific targets. The plan should propose prohibition on all peatland drainage and a national “re-wetting programme” should be initiated with input from the IPCC to restore bogs for the conservation of biodiversity and to maintain their carbon storage, sequestration capacity and associated ecosystem functions, including prevention of water pollution. The Plan needs to include a list of all waterbodies that have been impacted by peat extraction and other activates and how the issues will be addressed. The protection process needs to be more streamlined.

Financial compensation/collaboration and engagement with stakeholders will be required in order to ensure that mitigation measures can be successfully implemented. There will have to be grants

and other incentives to encourage and make financially viable a transition away from 'peat as fuel', and 'peat lands as farmlands' that are based on valuation of the peat areas on their carbon store/sequestration potential. There has been no publication of the NPWS monitoring of the Bord na Móna Peatland Climate Action Scheme (PCAS) programme so it's impossible to know what the impact will be in the coming years, NPWS enforcement on/around SACs unsuccessful. The work being undertaken by Bord na Móna and other landowners includes sustainability measures aimed at reducing impact of peat on water quality. Need to greatly increase investment in green infrastructure, which is often self-sustaining once restored or developed.

Q19: What are your views on industry, mines and quarries and the proposed measures outlined within the draft plan to address their impact on water quality?

The proposed measures should be revaluated. All quarries/mines should be audited for WFD compliance, and they should abide by green guidelines that are monitored by a reliable authority. The EPA needs to establish a working group with severe sanctions as there is a lack of accountability and mismanagement with minimal enforcement.

All quarries old and unused should be registered and the Water Stewardship Program and the EPA National Technical Implementation Group recommendations will need to be in sync with all other plans

Pilot project would be advisable, ideally lead by a specialist - to use nature based passive solutions where possible. Bord Iascaigh Mhara (BIM) would suggest that industrial emissions licences should provide for an independent treatment plant separate from the waste water treatment plant for human sewage and licenced with a full EIA on application. The provision of appropriate enforcement resources in regard to this aspect of water protection has significant potential to aid improvement to water quality if appropriately resourced.

Issues surrounding Lough Gill and tributaries being negatively impacted by quarry nearby. See submission 006 for further information.

Q20: What needs to be considered when making recommendations on the new approach to drinking water source protection as part of the transposition of the recast Drinking Water Directive?

An intensive raw water monitoring programme is required as an initial step in the drinking water source protection. A National Raw Water Monitoring Programme should be established under the auspices of the recast Drinking Water Directive expert group as an action in this section. This will ensure that all drinking water abstraction areas are part of an integrated catchment management plan where there is community collaboration on best practices. The link between the WFD and the recast Drinking Water Directive could be further strengthened in the final Plan. The National Federation of Group Water Schemes (NFGWS) suggests that an additional action in this section is needed, calling for a communications campaign focused on the protection of drinking water sources.

Upland habitat restoration needs to be prioritised in order to protect drinking water supplies (e.g., Wicklow Mountains), with water courses labelled as drinking water courses for public awareness with regular monitoring which should be accessible by the public with safeguard zones implemented around drinking water courses and sources.

These need to be also protected to prevent unwanted toxicants from entering them from nearby land. Appropriate funding and support to farmers going forward is key to the protection of drinking water courses. Fencing of watercourses and soil nutrient management should be included in the Good Agricultural Practice Regulations 2022. Appropriate staff with the relevant skill sets and training should be used for max efficiency as well as support offered to farmers. The recommendations of the NFGWS should be considered with water reuse and conservation looked at.

Q21: What are your views on the measures proposed for tackle the issue of invasive alien species?

There is a strong consensus that adequate funding and control is needed to tackle the issue of invasive alien species (IAS), as well as having a clear plan with the correct people / management appointed to tackle the issue with more research to be completed on best removal practices. There is no national coordinated response to IAS with little clarity on responsibility there is an urgent need for a centralised approach.

Stakeholder awareness and engagement is vital with the finding of local communities and action groups essential to identification and locating IAS. But an efficient and clear reporting system is required for actions to be taken on invasive alien species when reported by the public. However, the issue should not be left up to volunteering groups, however they should be used where they are most efficient and guided under a trained and experience employee.

Stricter measures to be implemented to prevent introduction with more attention and resources used to tackle them.

Salmon farms don't seem to be covered within the marine plan, this should be controlled to prevent them from becoming an invasive species.

Q22: What are your views on the issue of hazardous chemicals and the measures outlined within the draft plan?

Certain hazardous chemicals should not be available to the public / farmers and should be classified as a controlled substance, which can only be applied by a licensed individual or party with their application based on appropriate risk assessments being completed. A tracking system should be developed to manage and monitor.

Wider awareness and education are needed to inform customers of the harm these chemicals can cause to the aquatic environment. Education on how to dispose of hazardous chemicals and pharmaceuticals should be publicised to the public. Instead of them being flushed down the toilet or poured down a sink, with collection points being available for people to dispose of any expired or used chemicals they may have.

Stricter regulations regarding the sales of pesticides for domestic use should also be put into place with awareness programmes available to promote the use of more eco-friendly alternatives. Increased year round monitoring in shellfish designated water bodies should be in place to prevent these areas being contaminated with chemicals.

Q23: What opportunities would you suggest to strengthen the links between the Aquaculture licensing process and the objectives of the Water Framework Directive?

The Plan doesn't address all potential pressures from aquaculture and effective monitoring is not in place. The proposed measure should be more sufficient and targeted to identify individual pressures. An independent monitoring programme is needed to fill data gaps, and assess the risk posed by each farm to achievement of WFD standards in the relevant waterbody. Organic and sustainable aquaculture methods that have proven to be environmentally sound should be encouraged.

Recommend all licences be reviewed for WFD compliance, assessment of WFD compliance built into all future licences. Carry out an independent legal review of NPWS guidance on the licensing of aquaculture activities within Natura 2000 sites.

Aquaculture should be included in forums (that includes industry EPA, Irish water, DAFM, Marine Institute and DHLGH) to facilitate discussion and debate there is no direct engagement at present. This may address issues and allow for discussions on how best to implement measures.

Desirable to see further research into land-based closed aquaculture systems e.g., Salmon farms as an alternative to open-water net-based systems.

Finance research projects in order to develop sustainable and ecologically sound methods of farming in order to develop aquaculture at community/local enterprise level within just transition areas.

Q24: What are your views on the process identified to implement a new legislative and management framework for shellfish waters in Ireland?

Shellfish water protection needs to be put on a much stronger footing, legislatively, within the WFD. A single water basin protection/monitoring body should be formed which consults with other user groups on how to protect our river basins through effective monitoring and management.

Bord Iascaigh Mhara (BIM) are supportive of the legislative and management framework and the renewed emphasis on the protection of the shellfish waters. Licenced activities that deteriorate the water quality standards in a shellfish designated waterbody, e.g., suspended solids, E.coli, chemical should be halted/amended. Irish Water would like to be engaged as a key stakeholder, consulted on the design of the new aquaculture licencing system, particularly with regard to the processes for consultation on aquaculture licences and request the adoption of exclusion zones around waste water discharges, as per other neighbouring jurisdictions, aquaculture licenses for shellfisheries should not be granted outside of designated shellfish waters.

Maritime Area Planning (MAP) Act should be utilised when granting shellfish licences. Microbiological criteria in shellfish waters themselves should be written into such legislation. Shellfish water protection requires to be put on a much stronger footing legislatively within the WFD. There is a sense that no protection, accountability or responsibility has been taken due to the gaps relating to shellfish water when compared to other areas, also new areas cannot be designated currently as there is no legislation.

Q25: What are your views on the measures proposed in the draft plan to address issues relating to land use planning?

Currently the actions do not deliver the aims of the Plan, it is under resourced. A single department agency needs oversight of this to remove the conflicting views between agencies and departments. More training for the Competent Authority and Local Authority on this especially in sensitive catchments, including monitoring, management, reporting and enforcement. Cross collaboration between sectors is needed. This work should link with the current project being led by the Office of the Planning Regulator (OPR) in conjunction with the Local Authority Services National Training Group (LASNTG) and the County and City Management Association (CCMA) to address training needs within the planning service.

We would like to see evidence in the plan with regard to other cross cutting and complementary policies and strategies including National Planning Framework 2040, National Landscape Strategy 2015 -2025, the Climate Action Plan. There is much to be gained by strengthening the alignment of these policies with many resultant co-benefits and more effective use of resources. guidelines on the WFD and planning policy will need to be taken into consideration in the new planning legislative reform and will also need to align with the proposed abstraction legislation, Wastewater Discharge Regulations, Marine Protected Areas (MPA) Act and other relevant legislation. Guidance needs to be provided by the DHLGH in relation to WFD assessments. Simple incremental improvements, such as incorporating nature-based solutions into new or existing developments.

Recommendations within Submissions:

1) A WFD-specific assessment in advance of developments potentially impacting waterbodies e.g., dredging; drainage; flood protection. Projects can only go ahead if it can be demonstrated that WFD objectives will not be compromised.
2) A prohibition on wetland drainage and commitment to a national wetland restoration programme.
3) A review of the impacts of arterial drainage; and a commitment to review and
4) Amend the Arterial Drainage Act 1945 to remove the requirement to maintain drainage and to bring it into compliance with EU environmental law.
5) Full integration of water management in the upcoming Land Use Plan committed to by government, so that catchment- and nature-based approaches are central to it.

26: What are your views on the economic analysis proposed and the measures outlined under this section?

Adequate investment needs to be addressed and it needs to be made a political as well as an economic finance decision otherwise nothing will happen. The National Federation of Group Water Schemes (NFGWS) has previously suggested that members of this group should be provided with a detailed roadmap, outlining outputs and deliverables for the group in the medium term. Would like to see a valuation of ecosystem services provided by shellfish farming, particularly through nutrient removal and have it accounted for in any economic assessment of a water body. A natural capital and multiple capitals approach would be useful in highlighting the real dependencies and impacts of seafood sector activities on water quality in comparison to and in combination with other activities. Irish Water proposes the development of a collaborative national catchment modelling capability which would be applied at catchment level to assess the impacts and benefits of a range of potential cross-sectoral interventions in terms of achieving WFD objectives. Global factors create undue influence during planning, therefore the plan with its targeted actions and measures must be resilient.

Recommendations within Submissions:

1) To put in place a funding stream to upgrade and take in charge towns and villages without wastewater networks.
2) Finalise the review of rural water services and produce a rural water services strategic plan including a national rural water resources plan for the rural water sector.

4 TEMPLATE SUBMISSIONS

Of the 1401 submissions received by the DHLGH, 1143 were based on a template response email or document that was produced by other organisations. One template in particular accounted for 1097 submissions. The template originated from SWAN - the Sustainable Water Network which is an umbrella group for a number of environmental Non-Governmental Organisations (eNGO). The template was pre-populated with seven key recommendations.

The same template with minor variations, notably the addition of one further recommendation was also recorded for a further 46 submissions which were recorded as a campaign template on the submissions register.

While the majority of the template submissions were received from individuals (1133), a number of community groups (10) also made their submissions using one of these templates.

RPS received a representative 30 submissions based on the template, as part of the 259 submissions forwarded for analysis. Six of the submissions received were identical to the original template, one submission was representative of the campaign template and the remaining 23 submissions had variations including additional recommendations and issues.

A copy of the original seven-point template is presented in **Appendix B** to this report and the 7 recommendations are also stated below in Table 3-1: Survey Questions Based on Different Sections of Draft RBMP 2022**Table -1.** Variations and modifications in the other template examples are summarised below also. Further detailed analysis of the issues raised by the submission is available to the Department.

Table 4-1: Template Recommendations

Templated Recommendations
1) The plan must be far more ambitious and include targeted measures to restore ALL waters to healthy status by 2027 and halt deterioration.
2) Agriculture policy must be brought in line with the Water Framework Directive (WFD) to halt escalating pollution through a WFD-specific risk assessment for all intensive farms, including derogation farms, as part of a permitting system.
3) Prohibit wetland drainage and implement a national wetland restoration plan.
4) The Irish Water Investment Plan must end sewage pollution from all the wastewater treatment plants identified as the main pollution source in over 200 waterbodies.
5) Afforestation and felling licenses must include a WFD-specific assessment, with site-specific conditions to protect water. Afforestation on peat soils in acid sensitive catchments must stop.
6) The Plan cannot ignore the coast. It must set out all coastal-specific pressures and the measures to address them.
7) Water governance must be made transparent and brought into compliance with the Aarhus Convention. Participation of the public and local river groups in the development of catchment management plans must be facilitated & resourced.

4.1 Overview of Template Submission

Recommendation 1 in the template submissions points to a sense that the Plan lacks ambition and urgency to deal with current issues raised given current trends in water quality over the previous

two plan periods. This aligns with concerns raised through the online questionnaire responses and many of the 'free style' submissions received. The reference to restoring ALL waters relates to possibility for derogations in previous cycles.

Recommendation 2 points to the issue of conflicting government policy in relation to water and other key pressure sectors, notably agriculture. There is a perceived lack of alignment between water and agriculture policy which is contributing to poor outcomes under the WFD. Greater alignment is needed through improvement in permitting which focusses specifically on compliance with WFD.

Recommendation 3 highlights the issue of wetland drainage and the need for implementation of a national wetland restoration plan to mitigate the significant impacts of the unregulated drainage of wetlands. While some changes have been made to introduce controls on wetland drainage, they are not necessarily focussed on WFD compliance and avoidance of impacts in the first instance.

Recommendation 4 seeks to call attention to the impact of sewage pollution on a large number of waterbodies and the urgent need for Irish Water to tackle this issue with appropriate and specific measures.

Recommendation 5 focuses on the importance of a WFD specific assessment to be conducted prior to issuing any afforestation or felling licences. Such an assessment will consider site specific conditions to help with enhanced protection of the waterbodies. The cessation of afforestation on peat soils in acid sensitive catchments is crucial.

Recommendation 6 points out that the draft plan fails to address coastal specific pressures in its entirety and does not include any measures to address this issue.

Recommendation 7 indicates that the current Water Governance structure lacks transparency which is in contravention of the Aarhus Convention. For successful implementation of the catchment management plans it is highly recommended to involve the public and local river groups in the development process for these plans.

4.1.1 Variations and Modifications

In addition to the seven recommendations in the original template, a further recommendation was noted in a sub-set of submissions. The additional recommendation noted the following:

"We need a lead agency to take responsibility for improving each of our rivers. Right now, the split of responsibilities among agencies is leading to NO ONE taking full responsibility for our degrading water quality. COUNTY COUNCILS are the obvious fit for this job. They stand the best chance of delivering change. The river basin management plan should assign the county councils the responsibility for river basins in their areas and also have a mechanism for councils to interact where rivers cross borders. The role of the council should be to identify pressures on the water basin and make changes where it can improve water quality and when others are responsible it should chase up and seek compliance with legislation. This task of cleaning up rivers should be supported by robust monitoring and allow citizens to play a part in that, through supported citizen science monitoring approaches. We cannot allow poor governance structures to let state agencies and councils escape their responsibilities any longer.

Other themes raised in variations and modifications of the original template included: These are summarised as follows:

- Farmers Support: Farmers should be educated about the impact of spreading slurry or fertilisers in the proximity of the waterbodies and improved fertilising techniques. Grants should be made available to farmers to implement natural buffer zone of 5 to 10 meters of native species along all riverbanks to stop run off.

- Farm licences: Dairy farms should require EPA pollution licenses as pig farms do.
- ASSAP: EPA or the Department of Housing should not be involved in local ASSAP groups.
- Responsibility for water issues: A lead agency should take responsibility for improvement of the rivers and a nationwide education/awareness campaign is required for water and biodiversity conservation. ESB should be removed from having any authority over Irish rivers.
- Water Quality: The aquifers and ground water supply and local drains, streams and rivers should be protected from industry such as quarrying, forestry tree felling and agriculture. Expecting the Water Stewardship Programme holistic approach to protect water resources is totally unrealistic and inadequate. The impact of road drainage on water quality should be recognised as well.
- Funding and resourcing: The government should consider funding a dedicated semi-state body to purchase conservation easements from landowners who implement appropriate riparian buffers along our remaining high-status rivers and streams.
- Hydro morphology: River modifications such as culverting and straightening must end. The short-term benefits of immediate flood relief and drained land for development are outweighed by the long-term negative impacts through erosion and sediment transport downstream, habitat destruction and loss of amenity.
- Stakeholder engagement/ awareness: All issues related to our environmental crisis are inter-related and plans to address them must be intelligently designed with participation of all knowledgeable parties. A public information campaign would be beneficial to help individual households and communities take actions.
- Sustainability: Nature based solutions should be implemented, and habitat protection and restoration put as first priority for all works. There can be no progress towards sustainability unless the UN GOALS 14 and 15 are tackled in parallel and head on.
- Drinking Water Quality: Ireland continues to fail its obligations under the Drinking Water Directive by allowing excessive levels of Trihalomethanes (THM) in Irish drinking water. Sufficient resources need to be made available for the testing of water on a widespread basis and high-resolution hydrochemistry monitoring should be considered as part of the monitoring and enforcement plan.
- Location-specific pressures: Specific pressures were referenced including Bord na Mona IPC licence compliance with discharge to water with peat sediment into the Shannon (Lough Bannow Stream_010) and places like Derryadd in Longford should be reviewed. The River Dargle and River Bride are subjected to a high level of sewage pollution. The original wetland habitats along the final stretch of the river from Loughlinstown N11 Bridge to the shore are deteriorating and there seems to be no official Restoration Plan for Loughlinstown Common which has remained at pNHA status for many years. Former floodplains and wetlands have been developed on and the original course of the River Bride has been altered, resulting in flooding.
- Sewage pollution: The public should be encouraged to adopt compost toilets during planning permissions on a habitable site to limit sewage entering the waterbodies.

5 INDIVIDUAL 'FREE STYLE' SUBMISSIONS

Out of the 258 unique submissions issued by the DHLGH to RPS, 68 were individual 'free style' submissions sent from a cross section of consultees which were further categorised as follows:

- Government Department/Agency/Body
- Local Authority
- NGOs
- Community Groups/Associations
- Company
- Corporate
- Members of Public
- Political Party.

Further detailed analysis of the issues and themes raised by submission is available to the Department. The following section summarises the key themes and issues raised by the groups outlined above.

5.1 Government Department/Agency/Body

The main themes raised by Government Department/Agency/Body related to the development of proposed catchment management plans, water quality, peat drainage, land use planning and aquaculture. Agricultural issues were also highlighted along with forestry, hazardous substances, areas of action, monitoring, habitat protection, wastewater management and public awareness. **Figure 5-1** at the end of this section provides a representation of the frequency of various themes raised by this consultee group.

5.1.1 Catchment Management Plans

The OPW suggested that there is an inherently strong link between the multi-agency co-operation and engagement to promote nature-based solutions that can provide benefits including flood risk reduction and development of catchment management plans.

For local level initiatives, multi-agency groups should consider nature-based solutions for catchment management, noting the intended increase in the level of funding under the Community Water Development Fund.

All life under water should be prioritised in the plan as per WFD requirements. It is essential that the roll out and development of the catchment plans is supported and resourced and that there is clarity about their role, ownership, and oversight.

5.1.2 Measures to Improve Water Quality

There needs to be a commitment to incorporate the nature-based solutions guidance into all county development plans, and to finance such solutions. Sustainable drainage systems or similar passive treatment systems should be mandatory in any new urban or road developments and retrofitting considered where possible.

It is important that all mining activities must also comply with Departmental guidelines for mineral exploration, including the Guidelines for Good Environmental Practice in Mineral Exploration and the Guidance on Discharge to Surface and Groundwater.

A clear indication of targets associated with the measures should be included in the plan, as well as listing the multiple agencies potentially involved and potential budget. It should be clearly established whether the information related to the increase in waterbodies impacted by agriculture is a reflection of an enhanced data or an actual change in status. Further illustration/figures should be used in the plan to explain relevant governance structures to the reader.

In Appendix 2, further information is required in relation to #45 – DHLGH to establish a restoration programme. – this programme should not be limited to just construction as other areas have also has an impact in or near waterbodies.

5.1.3 Areas of Action

It is essential that the final plan addresses that given the short cycle and impacts of the Covid pandemic it is not yet clear what measures are, or are not working in the Priority Areas for Action and what actions have been closed out. The RBMP should fully consider aquatic biological diversity, the National Fisheries Resource, and the EU WFD. Plan/decision makers must consider climate disruption/the biodiversity crisis and associated mitigation measures.

5.1.4 Public Awareness

An overarching strategy on citizen science for water quality would be helpful to map out the tools available and ensure they meet the goals of citizen science in terms of data gathering and engagement and awareness. It is recommended that more targeted campaigns and events to encourage participation from water users e.g., angling/rowing clubs, the tourism sector and groups such as farmers, local industry etc. Additional campaigns would be useful to increase public awareness of grants available for upgrading domestic wastewater treatment systems and 'local advisers' to help the public through the process.

5.1.5 High Status Waterbodies

A review of the Blue Dots Programme and the measures required should be undertaken during the cycle to ensure that progress is being made and that any measures or changes required in national policies or programmes can be implemented rapidly. Identification of time scales for action and sourced of funding across relevant government departments and agencies is a key priority.

5.1.6 Habitat Protection

The protection of non-listed habitat for Annex IV/V species is lacking within the current AA process. A mention of guidance on protecting this habitat especially in SAC areas would be useful in Section 2.6.

5.1.7 Drinking Water Protection

There is no reference to antibiotics and their impact on Ireland’s water and efforts to control or contain their impact in the draft RBMP – it is important to highlight any progress in this area. More emphasis is needed in this cycle on measures to address protected areas and to ensure suitable measures and standards are in place and achieved to protect public health.

5.1.8 Wastewater Management

Irish Water should introduce a programme of works to install Event Duration Monitors (EDMs) on all storm water overflows. The Plan should consider that more action is needed to ensure that householders fix systems that fail inspections and to improve overall public awareness to encourage good practice.

5.1.9 Hazardous Substances

The Plan should be more ambitious and should include specific measures to prevent hazardous substances entering our waters.

The final RBMP should aim to leverage the proposed measures of National Hazardous Waste Management Plan (NHWMP) 2021-2027 in relation to management of hazardous wastes to deliver water quality improvement. The RBMP must address the threat that emerging pollutants such as 'forever chemicals' pose to biodiversity and water quality in rivers. and the precautionary principle should be applied when assessing potential contamination.

5.1.10 Forestry

There should be a commitment to address the issue of lack of buffer zones along watercourses due to self-seeding of Sitka Spruce on legacy sites.

The action in relation to addressing forestry related incidents should be strengthened in the final Plan to focus on prevention of incidents though closer supervision and oversight of operations particularly in highly sensitive areas by DAFM. The RBMP must tackle water quality issues linked to forestry "legacy sites" which are unsuitable for afforestation in the Land Types for Afforestation Working Document 2016, incl. most commercial forestry established prior to 'Forest Service Guidelines'.

5.1.11 Peat

There should be an action included in the Plan which recognises the hydromorphological damage to surface waters incurred in facilitation of commercial peat harvesting and a commitment to habitat restoration of these waters. It is important that all the schemes set out in the Plan related to peat restoration and rehabilitation are monitored and evaluated at appropriate level, and that lessons learned and implemented on a wider scale.

5.1.12 Land use planning

The final plan should highlight the need to link to the work done on land use review. The guidelines for the incorporation of the Water Framework Directive (WFD) into the planning system should be finalised and rolled out as soon as possible. Extensive training and awareness for planners and developers will be required to ensure it is fully implemented. The impact of developments on water quality should be integrated into all regulatory planning and development frameworks, for example, for forestry, aquaculture, foreshore and marine planning.

5.1.13 Aquaculture and Fisheries

The impact of aquaculture is often not seen at waterbody scale however effective regulation at site level is needed to prevent pollution and avoid any adverse impacts. It is recommended that the farming of Atlantic salmon in the sea is moved on shore to recirculatory facilities where outputs and pathogens can be appropriately controlled. Aquaculture policy and licensing needs to be aligned with national, EU Directives and international responsibilities and obligations in relation to conservation of wild fish stocks and the aquatic ecosystem.

Fishers' interests and livelihoods must be fully recognised, supported, and taken into account in the development of any measures. A number of site and issue-specific initiatives should be developed via the Regional Operational Committee network with a focus on maximising the potential co-benefits associated with achieving WFD objectives and improving conditions for fish (such as prioritised instream barrier removal at specific location under action category 5.4.2). The level of commitment by DAFM to implementing the actions proposed for the aquaculture sector needs to be stronger in the final Plan.

5.1.14 Nutrient Sensitive Areas

It is important that the action to update the designations of Nutrient Sensitive Areas in legislation to allow their consideration in licensing decisions is completed without delay. Nutrient budgets should be calculated for each catchment and new agricultural units should not be granted planning permission in catchments where the nutrient budget will be exceeded. Appropriate penalisation according to 'polluter pays' principle and enhanced capacity for regulatory authorities to enforce relevant environmental legislation.

5.1.15 Invasive Species

The development of a more coherent and co-ordinated national approach to IAS management is required that will facilitate better communication and collaboration between relevant authorities. A dedicated Invasive species section, with appropriate funding within NPWS, EPA, IFI or other agency should be progressed. The introduction of non-native fish and other species should be explicitly prohibited in attenuation ponds, water bodies linked to sand pits and quarries, ornamental ponds etc.

5.1.16 Flooding

The flooding impact of poor siting and design of developments must be addressed and planning for rainfall events needs to be reassessed.

5.1.17 Cultural Heritage

There is no mention of cultural heritage in the draft Plan.

Pg. 61-5.4.2 The last sentence should include 'Cultural Heritage' and be reworded as 'Flood Control, Cultural Heritage, food, fish and other biodiversity may all be harmed by changes to, and fragmentation of, rivers.'

Pg75-5.4.14 3rd paragraph 2nd sentence should include 'Cultural heritage' and be reworded as ‘The potential impact from finfish farming, can include impacts on water quality, biodiversity, the condition of the local habitats, cultural heritage, risks from the use of pesticides and threats from the introduction of non-native species.

5.1.18 SEA Related Comments

Section 2.6 of the draft plan should also clearly address how the findings of the SEA Environmental Report have been integrated in the Plan. Any future amendments to the Plan should be screened for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan.

Chapter 8 of the SEA Environmental Report includes an extensive list of detailed mitigation measures. It is important that the recommendations of the SEA Environmental Report are fully integrated into the Plan, or if not the case, an explanation provided as to the reasons for not including them. Likewise, the mitigation measures from the appropriate assessment should be integrated into the Plan. The Plan should also provide a clear indication of how these mitigation measures will be implemented.

If the monitoring identifies adverse impacts during the implementation of the Plan, DHLGH should ensure that suitable and effective remedial action is taken.

The implementation of the Plan should include provisions for annual reporting on implementation of the Programme of Measures. The Plan implementation, monitoring and reporting should be aligned with the environmental monitoring and reporting required under the SEA legislation.

The SEA Environmental Report discusses all of the relevant issues extensively. The inclusion of the SEA objectives in tabular form which clearly shows how the objectives are linked to each of the SEA topics as well as the UN Sustainable Development Goals is welcomed. There is merit in also considering SDG Goal 3: Good Health and Wellbeing and the relevant links with the Plan.

The links in the baseline information of the SEA ER to the EPA State of the Environment Report (SOER) 2020 is welcomed. However, the baseline can be further strengthened through references to the baseline information from the previous two river basin management cycles. The use of data from the previous cycles would present a clearer picture of trends for key environmental receptors. The baseline should be updated with reference to the new EU Soils Strategy and its relevant objectives which has been published in the interim since the public consultation commenced.

There may be merit in identifying the key relevant policies and plans in the main text of the document and including the other relevant plans as an appendix to the report. This would enable the Environmental Report to identify which policies and plans are likely to have significant impacts and so which proposed mitigation measures are the most important measures with respect to the Plan.

It was noted that in Table 5- Inter relationships between SEA topics, the SEA ER fails to recognise the important relationship between cultural heritage and biodiversity. Many heritage assets provide areas of key habitat in themselves or secondarily through their influence on surrounding landscape character. In the riverine, or canalised environment bridges, banks and historical wreckage can provide discrete areas of special habitat.

It is recommended that in relation to monitoring the effects of the implementation of the plans be considered against appropriate monitoring measures in relation to both water quality and resource. It is essential that associated trigger actions and interventions (including plan revisions where required) are undertaken if any unforeseen or adverse environmental effects to the aquatic environment are identified as a result of the plans.

SEA Scoping Report (Pg. 112) fails to include a reference to the National Monuments Service's Wreck Inventory of Ireland Database which contains the historical record of all historic wrecks within Irish waters. This should be included.

Appendix A 'Regional level plans & programmes' 'water and wastewater' should include the 'UK Fisheries Act 2020' - a legal requirement for the UK's four national

Fisheries policy authorities (Marine Management Organisation (MMO), Scottish Ministers, Welsh Ministers, and the Northern Ireland department) to produce a Joint Fisheries Statement (JFS) that will lay out how these objectives will be met. The Act requires these authorities to produce the JFS within two years of the Fisheries Act being passed. This act will form the basis of any changes to the Fisheries Act (NI) 1966.

Appendix A - 'Regional level plans & programmes' under 'cultural heritage' should be 'Protection of military remains Act 1986' – An Act to secure the protection from unauthorised interference of the remains of military aircraft and vessels that have crashed, sunk or been stranded and of associated human remains, and for connected purposes.

It is worth noting under 5.2.1.4 of the SEA reports that IFI is the primary body for management of certain sport fish and freshwater species of fish. The DAFM holds responsibility for sea fishing.

The SEA ER recommends that a mid-term review of the overall progress on implementation of the Plan measures be undertaken. This would be a key means of evaluating the progress towards implementing the programme of measures and achieving the objectives in the Water Framework Directive.

The SEA ER should reflect the alignment and consistency between the objectives of the National Planning Framework (in particular National Policy Objectives 50, 52 and 571), the three Regional Spatial and Economic Strategies and the River Basin Management Plan.

Both SEA ER and the Plan would benefit from the inclusion of a schematic showing the hierarchy and inter relationships of the other relevant plans and programmes, e.g., Nitrates Action Programme, Irish Water plans, etc.

The analysis of the alternatives would benefit from referring to the alternatives considered under the environmental assessment of the second cycle RBMP and how they differ to those considered under the current proposed iteration so that the learnings from previous cycles can be applied.

A number of mitigation measures refer to the requirement for further plans (e.g., Rural Waters Strategic Plan, Integrated Catchment Management Plans, Water Services Strategic Plan) to undertake SEA and appropriate assessment screening. It is important that DHLGH and relevant plan making authority(ies) consider the requirements of the SEA Regulations (S.I. 435 of 2004, as amended) and the Habitats Directive, early, in the plan-preparation process.

The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise during implementation. The monitoring programme should set out the various data sources, monitoring frequencies, responsibilities and reporting. Some of the parameters included in the SEA Environmental Report for monitoring do not have data sources, e.g., peat, soils. This should be addressed before a final monitoring programme is agreed.

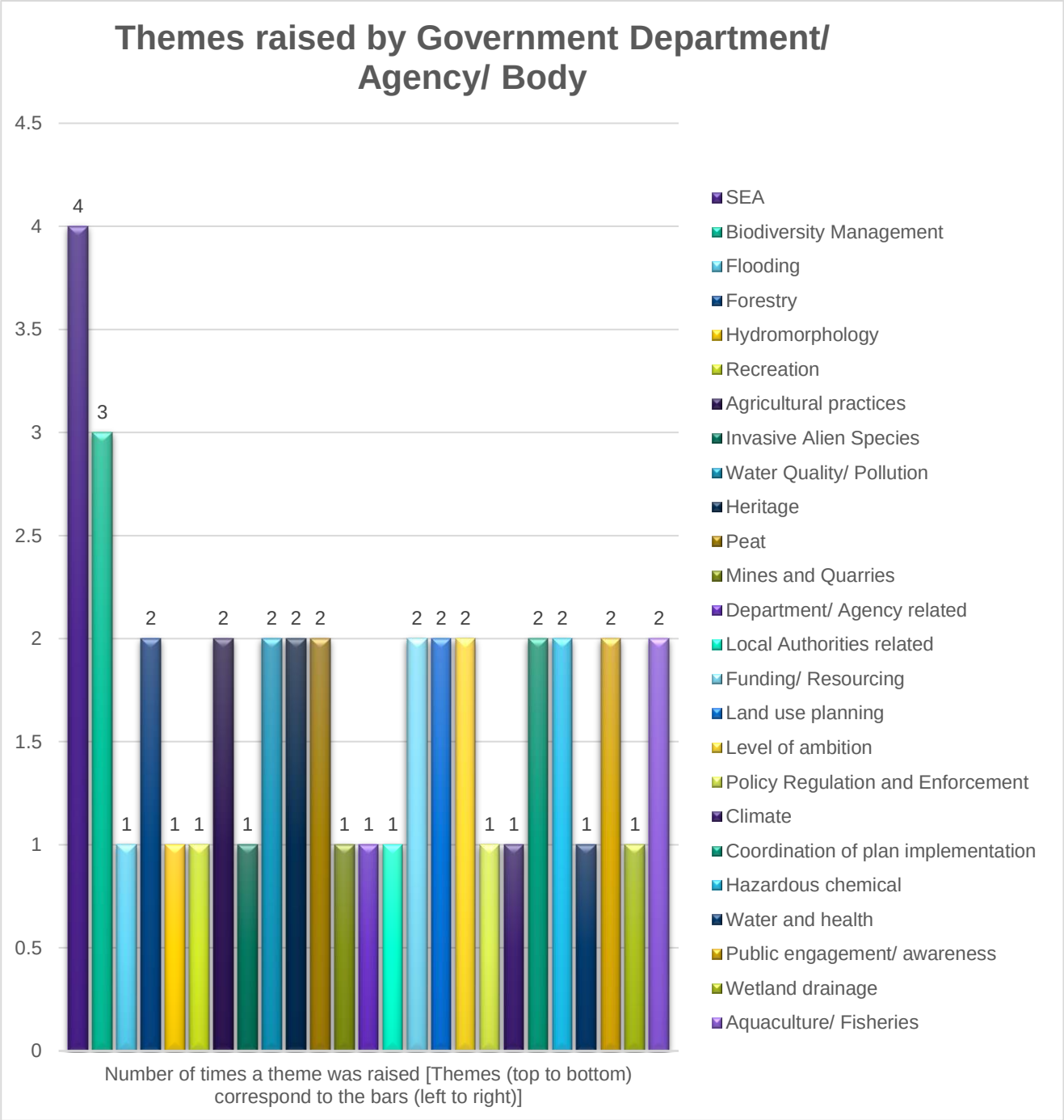

Figure 5-1: Frequency of the Themes Raised Across Submissions from Government Departments/ Agencies/ Bodies.

5.2 Local Authority

The main issues raised by Local Authorities (LA) relate to the lack of resources, funding, and available training. Agricultural was also highlighted along with compliance, monitoring, management and community engagement. **Figure 5-2** at the end of this section is the representation of the frequency of various themes raised by this consultee group.

5.2.1 Catchment Management Plans

The 46 sub-plans will require significant time and resources. The fundamental principles of how these plans are to be developed needs to be determined by DHLGH prior to preparation of the template by LAWPRO. The issue of whether or not these are statutory plans (as sub-plans to the RBMP) and whether or not they require SEA and AA needs to be determined. It is recommended that one Catchment Management Plan should be piloted in each of the five LAWPRO regions.

5.2.2 Water Governance

There is a need for greater coordination among the implementation bodies in particular LA and DAFM and it is imperative that policy coherence is achieved between water, climate and biodiversity plans and measures.

Figures 7 and 8 in the draft plan should be expanded or developed to clearly show who is represented at each level, governance body, and committee together with details of their roles and responsibilities.

It is advised that the final RBMP 2022-2027 includes clear guidelines and targets for consultation phases at the sub-national level too.

Figure 18, 3rd Cycle Areas for Action the Santry River Restoration and Greenway Project falls into all three categories and could be considered as an exemplar for (urban) river catchment management. The 3rd Cycle Plan should include actions to improve data capture in relation to unassigned waterbodies that are discharging into transitional and coastal environments.

5.2.3 Legislative Changes

The National Planning Framework (NPF) requires that the National Policy Objectives (NPO) are reflected in any future RBMP. Any enhancement in planning guidance should be published under Section 28 of the Planning and Development Act to ensure a statutory footing and a methodology should be outlined to implement a catchment-based approach to policy across Local Authority Development Plans. The Sewage Sludge in Agriculture Regulations and the Water Pollution Act need to be reviewed and updated.

Consideration should be given to review and address conflicts between WFD objectives and the requirements of the Arterial Drainage Act, as well as agricultural land reclamation, agricultural drainage practices and coastal zone management

5.2.4 Hydro-morphology

National water priorities should also be assigned annually by EPA during the Recommended Minimum Criteria for Environmental Inspections (RMCEI) process and county plans must be aligned with the EPA National Environmental Priorities for Water.

Supports for mitigating hydro morphological pressures should be given higher consideration in the Plan and should be informed by the findings of the River Restoration Framework led by the EPA and the Review of Heavily Modified Waterbody Designations currently out for public consultation and due for inclusion in the final RBMP.

The section in the Draft Plan referring to Hydro morphology lacks the level of detail required to address this problem which has obvious connections with other significant pressures such as agriculture and works carried out under the Arterial Drainage Act.

5.2.5 Funding/Awareness/Public Engagement

The importance of improving and maintaining water quality is not fully apparent to much of the general public as there is not a complete understanding of what the issues are and their importance, what are the impacts and what can the public do to resolve the issues needs further clarification and refinement. Community water development funds needs to be increased in value and allow for greater sums to be drawn down, work needs to be beyond national level.

The draft RBMP does not clearly identify the investment supports for Local Authorities to implement projects that include water quality objectives.

A national water literacy campaign should be developed and implemented throughout the 3rd cycle to encourage involvement and buy-in.

5.2.6 Resources and Training

There is very limited capacity to prepare and implement County River Basin Management Plans as well as enhancing the existing monitoring programme or reporting on RBMP implementation. The assessment of resources should take account of the increased ambition that needs to be set out in the County Implementation Plan. The development of training for implementing bodies and assistance to review their roles to encourage better participation in the relevant governance structures is required. LA staff need regular training including those in relation to farm and septic tank inspections, discharge licensing, sampling, bathwater characterisation, protection of shellfish waters and drinking water sources, enforcement of Good Agricultural Practices (GAP) Regulations and Water Pollution Acts, DWWTS site suitability assessment training, environmental assessment of planning applications and forestry licenses. Multi-annual core funding is necessary if catchment partnerships and rivers trusts are to partner public bodies in delivering on RBMP water quality objectives.

A full list of training necessary and skills required to fulfil LA obligations for implementation of the RBMP should be identified, set out and approved for funding.

5.2.7 Monitoring, Management, Enforcement

Effective monitoring is essential to achieve successful plan implementation. A national data recording and management system is necessary to ensure statistics can be captured and tracking of enforcement. The available data management systems in place have restricted access for some government bodies that need the data to support their actions under the RBMP. WFD sampling work should be directly managed by the EPA, the scope of the EPA responsibility needs to extend beyond the boundary of the EPA licenced facility. A risk-based monitoring system should be put in place and the licence review process actioned in the draft Plan should be expanded to include certs of authorisation. Prioritisation of investment on identified WWTP where discharges have significant pressures on waterbodies and impacts on WFD objectives is essential. Improved data-sharing agreements, particularly spatial data in the form of GIS mapping, should be developed, with existing map viewers limited to their respective administrative boundaries. Continue the rollout of the implementation phase of nature-based solutions-SuDS and develop appropriate training and technical guidance material. Clarification should be provided on the required governance structure within LA to successfully implement Nature Based Solutions.

It would be helpful if the final plan sets out further details on monitoring and implementation.

5.2.8 Compliance Assurance

The addition of ASSAP was envisaged to provide extra capacity to achieve water quality objectives, however this has not materialised and in practice has placed an intermediate step between LAWPRO and water quality objectives; one which is not transparent. Compliance assurance needs a stronger priority in the third cycle, one of the main ASSAP findings is that GAP Regulations compliance is inadequate in many areas. LAWPRO has no visibility on the true impact of GAP non-compliance issues on farms, as measures recommended by ASSAP are not differentiated between basic measures and supplementary measures. Registration, authorisation, and training should be a requirement while focusing on the number of farms visited is not an appropriate KPI and the legislation at present is inadequate to allow appropriate assessment of environmental impacts of agricultural drainage. Continued and improved engagement and support of farmers and contractors is needed for a sustainable agricultural mode. Forest Services are not resourced to monitor compliance and enforce their licence conditions, it would be much more effective if the DAFM was fully resourced to manage forestry and compliance with licences to prevent pollution and impacts on the environment.

5.2.9 Aquaculture

A national awareness campaign on Blue Dot catchments and high-status objective water bodies is needed to ensure their status is protected and restored where necessary. Proposal for a new legislative and management framework for shellfish waters in the draft plan should be aided with appropriate resources. There is a need for greater recognition of the impact of individual incidents on marine water bodies including shellfish areas.

5.2.10 Water Quality

There is a need to review the DWWTS grant scheme so that more homeowners can avail of it and the reviewed grant should cover all the total cost of system upgrade. The certification system for UWWTP should be reviewed, to ensure that nutrient inputs from small urban wastewater treatment plants are monitored. Work would need to be progressed on the separation of storm and foul sewer infrastructure in many of the larger towns in the county. The issue of uncontrolled use of herbicides should be prioritised also to include a national education and awareness campaign for the use of herbicides as weed control near watercourses for the domestic/community users. Local Authorities state the in relation to an extension of the bathing seasons additional resources are required to carry out extra monitoring for the extension, in particular discretion to local authorities on determining the bathing season for individual bathing waters. The localised policy making pertaining to Bathing Water Regulations and in the draft RBMP on Pg. 67 is not supported as it could result in the determination of up to 148 different bathing seasons nationally.

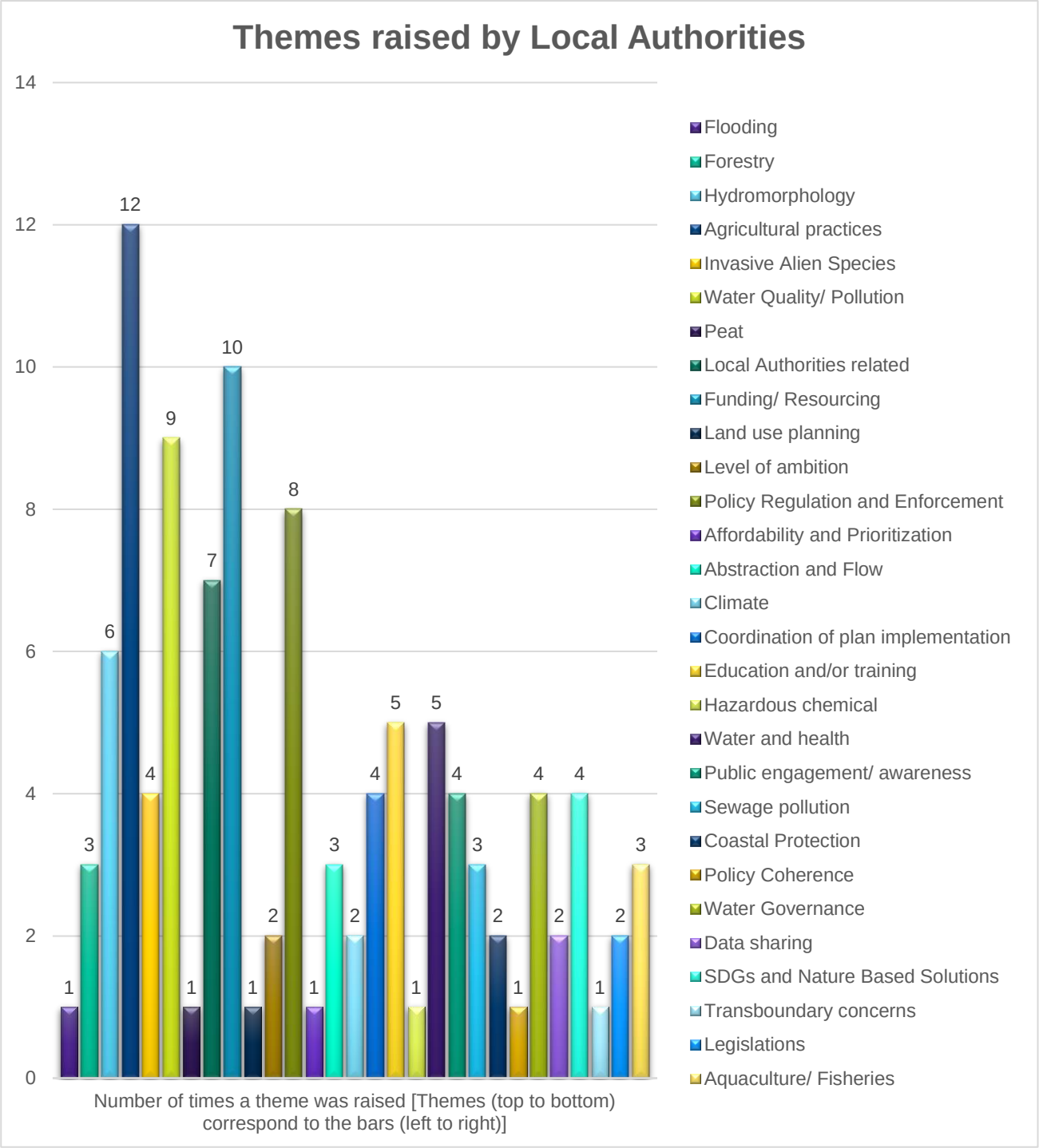

Figure 5-2: Frequency of the Themes Raised Across Submissions from Local Authorities.

5.3 Non-Governmental Organisations

Most of the NGOs had similar concerns regarding the lack of ambition in the draft Plan, sectoral issues including that of agriculture, waste water treatment, wetland disturbance, forestry along with the issues relating to water quality, flooding and aquaculture. It was noted that appropriate funding and increased transparency is required for successful implementation of the plan. **Figure 5-3** at the end of this section is the representation of the frequency of various themes raised by this consultee group.

5.3.1 Ambition

There is a lack of ambition in the draft RBMP to meet any requirements of the WFD, which could negatively affect water-dependent bird species as well as high status waterbodies.

All actions must be specific, measurable and time-bound, with the responsible body assigned and accountable. A measure to tackle dumping in the rivers and littering of the riverbanks should be included in the plan.

5.3.2 Agricultural Issues

The RBMP must address the policy conflict between agriculture targets and meeting the objectives of the WFD. There must be clear coherence between the Water Framework Directive objectives and Department of Agriculture, Food and Marine policies, the Common Agricultural Policy (CAP) and the Nitrates Action Programme (NAP). There is a constant need for continued collaboration and knowledge exchange with farmers and advisors, and expansion of programmes like ASSAP and Smart Farming that work with farmers to deliver behavioural change. It is vital that farmers are supported and financially incentivised to manage upland areas in a sustainable way.

Despite the failure of current regulation and policy in relation to nutrient pollution, the draft plan proposes no additional systemic measures beyond the revised NAP and CAP Strategic Plan.

The lack of a specific measure in the RBMP calling for a site level assessment of a derogation is a dereliction of duty by the Department, in contravention of Article 5 of the Surface Water Regulations 2009.

5.3.3 Wetland Drainage

The RBMP should include a prohibition on wetland drainage and commitment to a national river and wetland restoration programme. This must include coastal wetlands and blue carbon habitats.

5.3.4 Waste water Treatment

Irish Water should install tertiary sewage treatment plants for all towns and villages in the coming decade. Domestic waste water treatment systems need to be inspected and where upgrades are needed, the inspectors' advice must be enforced. New applicants should have access to a fund to assists homeowners in upgrading their domestic waste water treatment systems.

The release of waste water in the River Dodder is becoming a serious problem, especially at Windy Arbour where storm water drains are regularly realising sewage. There is a lack of follow up procedures in relation the establishment of DWWTS at new buildings by Local Authority staff to ensure the correct DWWTS was used and that it was installed correctly.

5.3.5 Forestry

The RBMP lacks targeted measures to deal with legacy forestry issues to prevent the impact on high status water bodies. Native forests should be enhanced to help with restoration of ecological functioning that will in turn benefit watercourses.

An action should be included to incorporate learnings from Waters of LIFE pilot projects.

5.3.6 Water Quality

The plan lacks specific targets for the improvements in water quality issues over the time frame presented. A consideration of time lags should become standard in the design of water quality policies so that the most effective management and mitigation practices can be designed.

The plan lacks empirical evidence of the progress made by ASSAP and LAWPRO. Water quality monitoring regimes need to increase, and the data obtained should be readily accessible.

The Water and Planning Guidelines stipulate the requirement for a WFD-specific assessment in advance of any works or development being carried out to protect water quality.

Improvement goals need to be put into place as a target for the polluted waterbodies condition to reach. There is an urgent need of sufficient resourcing and mandatory training for local authority and DAFM staff on catchment management, and training for farmers and contractors on water quality, nutrient management planning etc.

RBMP must fully acknowledge the investment being made by farmers to protect and improve water quality and ensure that time is given to accurately evaluate the effectiveness of these measures.

The final RBMP should offer specific measures to address shortcomings and failing to specify the number of waterbodies which are un-assessed and/or below the required standard.

It should also include an action for Irish Water to address the deficits in treatment in the 208 water bodies at significant risk from urban waste water treatment.

5.3.7 Flooding

A more precise consideration needs to be applied when looking at the maintenance and/ or restoration of floodplains with areas at risk of flooding being also mapped out. A greater emphasis is needed on restoration of lateral connectivity of rivers with their floodplains.

The RBMP should commit to WFD-specific assessment in advance of developments potentially impacting waterbodies.

The plan also lacks analysis on the arterial drainage impacts and analysis on the damage caused to rivers.

5.3.8 Biodiversity Management

The RBMP should recommend a Biodiversity Net Gain approach to planning that truly prevents significant habitat loss within river basins. Catchment level modelling done by EPA/ Teagasc/NPWS should define limits for climate/biodiversity/ water targets.

5.3.9 Legislative Changes

Water Act needs to be consolidated with budgets, timelines and sanctions to mainstream water protection in government policy alongside climate and biodiversity action and fix the fragmented water governance system. Use of the Arterial Drainage Act is in contravention of the WFD, other directives and conventions and aspects of Irish law.

5.3.10 Funding

The final RBMP should identify the lead agency within government with the role and the powers to compel compliance with environmental legislation, across all arms of central and local government and all of society and fund them accordingly.

5.3.11 Drainage

The issue of Arterial Drainage Act being in contravention of the WFD is absent from the clear commitments of the plan and needs to be addressed.

5.3.12 Lack of Transparency During Implementation

There is a lack of communication and publicly available data relating to relevant waterbodies. Increased transparency and accountability of the implementation bodies of the RBMP and structured engagement between the stakeholders and all tiers of governance is needed for successful implementation of the plan.

The RBMP should be monitored annually, and interim outcomes reviewed every two years to assess implementation and ensure progress towards the WFD objectives.

5.3.13 Aquaculture

The RBMP does not adequately deal with aquaculture. The plan should address the poor monitoring and data availability on the pressures from aquaculture as they apply to WFD status.

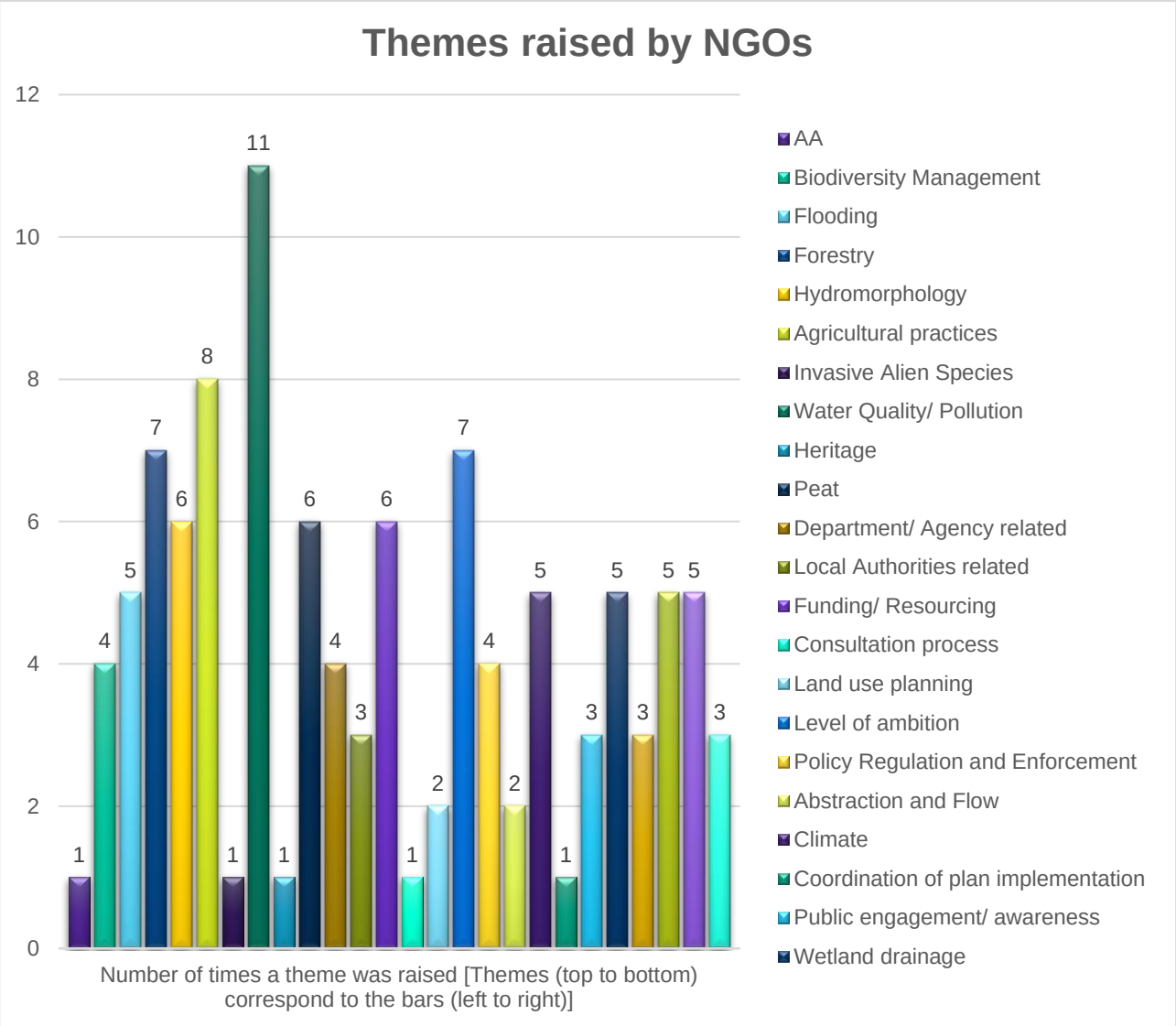

Figure 5-3: Frequency of the Themes Raised Across Submissions from NGOs.

5.4 Community Groups/Associations

The primary issues for different community groups/ associations were related to waste water treatment, flooding, water quality, funding and education provided to stakeholders, lack of prosecutions, SAC protection, aquaculture, invasive species, and the sectoral issues including that of agriculture, forestry, and coastal. It was highlighted that there is a strong need to foster a collaborative approach within sectors including wastewater treatment and work positively with the farming sector to deliver improvements in water quality. The need for appropriate funding and resourcing to deliver necessary measures is significant. **Figure 5-4** at the end of this section is the representation of the frequency of various themes raised by this consultee group.

5.4.1 Waste Water Treatment

Irish Water and local councils need to install tertiary sewage treatment plants for all towns and villages. The authorities must ensure they are maintained, upgraded, and monitored effectively. Any person willing to upgrade their domestic wastewater treatment system should be eligible for grant aid.

There is an urgent action required to address the issue with the overflows on the waste water network in Galway City which overflow during rainfall events which are of a lower intensity. All stormwater overflows should be fitted with sensors to monitor the frequency and duration of discharges and the volumes discharged.

5.4.2 Flooding

Existing flood defences including planting of trees on the riverbanks should be assessed and any new flood defences should be carefully considered for any new housing developments built near rivers. Merlin Park Woods rivers on the east of Galway City should be restored and removed from the storm drain systems.

5.4.3 Water Quality

A commitment should be made to create a real-time water quality data set that is both user friendly and easily accessible to all. It is crucial that the drinking water is continuously monitored for PFAS chemicals, industrial chemicals, tyre and road wear particles and micro-plastics and that urgent action is taken in removing the pollutants if discovered. The bathing quality should be measured all year round and the full year should be made the mandatory season for all local authorities.

The expansion of greenways across the country should be protective of rivers and that any impact on riverbanks from human footfall should be considered and examined carefully before the opening of new greenways. Redevelopment of our Inland Waterways must be done in a sustainable manner and in line with the protection of existing SAC's/SPA's and the indigenous species found therein.

5.4.4 Funding

Long-term core funding to cover staff costs and essential organisation requirements provided for on a multi-annual for river trusts, catchment groups etc basis is needed to ensure public involvement.

5.4.5 Education

The measure of providing education on issues have been too slow and is a generational aspiration.

5.4.6 Lack of Prosecutions

There is a lack of prosecutions for flagrant violations of the directives including those done by Irish Authorities.

5.4.7 Protection of SACs

For our Salmonid SACs to survive an entirely new approach will be necessary. All extraction plants that extract water from SAC's must be subject to Appropriate Assessment Screening and EPA licencing and should be located downstream of the SACs.

5.4.8 Aquaculture

All aquaculture licences existing, and future must be screened for compliance with Water Framework Directive (WFD). It is essential to shut down all open sea cage salmon farms to protect all fish species in our rivers, lakes, and sea bays.

5.4.9 Agriculture

The provision of strong public funding and support for farming communities engaged in actions to improve water quality such as slurry management is critical. The proposed list of Eco schemes by DAFM is very limited with few options available for commercial dairy farmers. The banding of cows under the Nitrate regulations is not the correct course of action and should be reviewed.

Critically the Plan does not address the policy conflict between agriculture targets and meeting the objectives of the WFD. The current RBMP relies heavily on the voluntary ASSAP initiative but a comprehensive regulatory, voluntary and combined programme of measures, with supports, is required to reverse pollution impacts. It is proposed that both ASSAP and LAWPRO resources are increased to allow the programmes to be extended to all catchments where water quality is under threat. This should include funding within ASSAP for farmers to install facilities e.g., solar pumps to prevent water quality deterioration. The process of dealing with areas with poor water quality should be a consultative process carried out in an ASSAP style procedure or by the ASSAP programme itself.

Regulations under the Fifth Nitrates regulations and 2022 Nitrates Derogation are more than sufficient and indeed excessive in achieving the 6 goals set out for agriculture in the draft plan.

5.4.10 Other Sectoral Pressures

The lack of identified pressures on transitional and coastal (TRAC) water bodies and targeted measures to address them in the plan, makes it unlikely that the status of TRAC water bodies will improve by 2027.

Additional regulations put in place regarding forestry must not act as a major dis-incentive to forestry.

5.4.11 Invasive species

Where appropriate and safe, community groups can engage in 'citizen science' initiatives where invasive species can be safely removed by members of the local community groups.

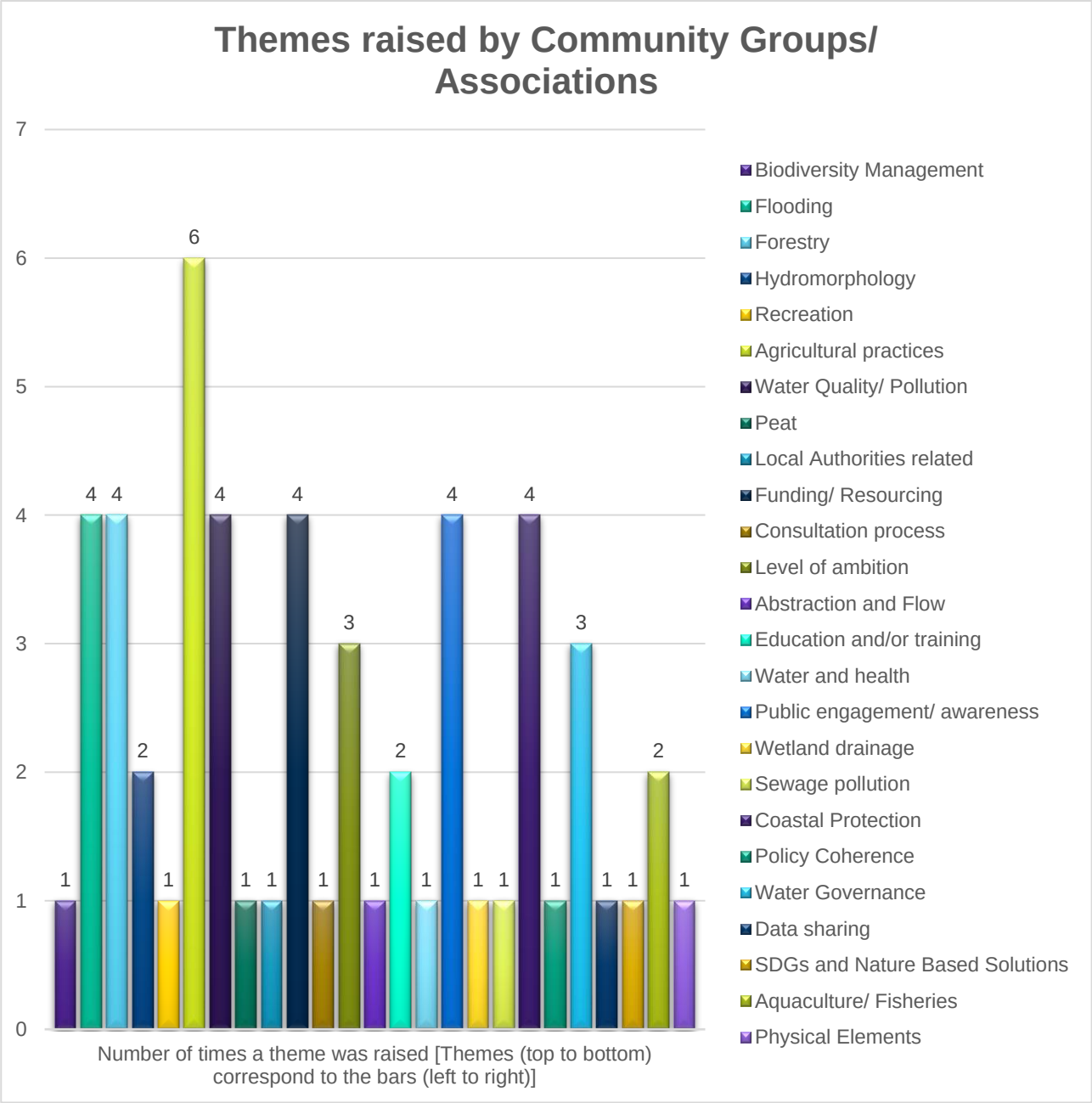

Figure 5-4: Frequency of the Themes Raised Across Submissions from Community Groups/ Associations.

5.5 Company and Corporate

A small number of private and semi-state companies made submissions.

One of the main issues raised in this category was the spread of invasive species. It was observed that the spread of invasive species across Ireland is increasing, and strict measures are required for prevention and/or mitigation of the impacts. Another area of concern was the peat extraction and drainage. It was noted based on the EPA's most recent reports that peat extraction and drainage are impacting on 106 water bodies across the country, with peat being the single pressure on 28 of these water bodies. Specific commentary relating to Dublin Airport were also noted. **Error! Reference source not found.** at the end of this section is the representation of the frequency of various themes raised by this consultee group.

5.5.1 Invasive species

The three actions relating to the aquatic IAS that are not brought forward from the 2nd cycle should be included in the current plan. Additionally, the plan should propose that all-Ireland Invasive Species Ireland (ISI) Forum should be re-established to help mitigate the advancement of IAS. NPWS should develop a National Biosecurity Strategy for IAS in Ireland, informed by best practice as operated elsewhere in the world. There is a need to provide sufficient resources to the National Customs Service in Ireland to prevent the entry of IAS through the ports.

5.5.2 Peat Extraction and Drainage

Compared to the data in the second-cycle plan, the number of water bodies impacted by peat has decreased and this should be recognised by the current plan.

5.5.3 Dublin Airport

Dublin Airport Authority (daa) is broadly supportive of the plan especially the inclusion of Mayne_010 sub-basin. It has adopted measures as specified in Dublin Airport Drainage Management Plan (DMaP) to protect waterbodies in its vicinity. It is envisaged that the targets, measures, and performance criteria presented in the Annex 1 of the Dublin Airport Drainage Management Plan (DMaP) would be linked to programmes of measures for the waterbodies surrounding the airport in the 3rd Cycle RBMP.

5.6 Members of Public

The main issues raised by the members of public focused on the responsibilities of different stakeholders towards the improvement of water quality. There should be a means for public to raise concerns about urgent issues in their localities and the defaulter should be penalised adequately. It is important that education in relation to water quality, agricultural practices, and invasive species should be provided to relevant stakeholders for successful implementation of the plan. **Figure 5-5** at the end of this section is the representation of the frequency of various themes raised by this consultee group.

5.6.1 Internal Reviews within Departments/Agencies

With the arrival of a new RBMP, every department/agency should be required to carry out a thorough internal review to ensure that it is fully fit for purpose in respect of its role under the RBMP. It should be a requirement that proof of this is provided to the appropriate management body.

5.6.2 Drinking Water Quality

For drinking water quality, a permanent position needs to be created where they monitor and test water sources. It is critical to ensure sufficient staff are trained in environmental science and legal practices. Local Authorities should regularly test and release the results to the public with the power to prosecute for water quality breaches and be made responsible for the water quality in their area. Volunteer groups and communities should not be given the task for monitoring / assessing water bodies, but they should be used where applicable. Anyone discharging into a water body must be licensed and regularly inspected.

5.6.3 Complaints Procedure

A clear and simple system is needed to allow the public to make any complaints or concerns where they will be given a response.

5.6.4 Forestry Issues

No action is proposed to force Coillte to implement the present Forestry Guidelines including the ones related to establishing buffer zones. On the Owenboluisce system in Connemara, 44% of order 1 and 2 streams have no buffer zones.

5.6.5 Issues Related to Dams

Dams being used for flood control need to have a duty of care for people living downstream as well as the surrounding biodiversity that can be affected. Damage to biodiversity being caused by dams needs to be reviewed in the Gearagh.

5.6.6 Waste Water Management

Overflowing of sewage plants is a serious problem which needs to be rectified. Waste water management and treatment upgrades are crucial, with expanding the sewer network to connect smaller towns.

Ballingeary Waste Water Treatment Plan (WWTP) has been in a very poor state, overflowing in times of flood and depositing human waste over a wide area including the nearby GAA pitch. There is no sign of plans for replacement, repair, or upgrade of this plant from Irish Water.

A long-term sustainable solution for wastewater management and treatment is required for the Naul Agglomeration

5.6.7 Farmers and Water Quality

Farmers should be encouraged and educated regarding the potential pollution they may cause, with potential grants to allow for a setback from water courses to prevent water runoff with inspections of farms to ensure no pollution is taking place. A push for the use of more organic fertilisers would be very beneficial. Land spread burden must be independently tested on a regular basis, and not let to be "self-regulated. Buffer zones to be implemented to prevent silt from entering watercourses with regular inspections taking place to monitor turf cutting. More precise and regular water testing at farms should take place.

5.6.8 Invasive Species

A more thorough scheme with appropriate funding needs to be implemented to limit IAS from entering and spreading around Ireland. Education should be provided to the public about how to manage and deal with IAS they may encounter.

The three actions relating to the aquatic IAS that are not brought forward from the 2nd cycle should be included in the current plan. Additionally, the plan should propose that all-Ireland Invasive Species Ireland (ISI) Forum should be re-established to help mitigate the advancement of IAS. NPWS should develop a National Biosecurity Strategy for IAS in Ireland, informed by best practice as operated elsewhere in the world. There is a need to provide sufficient resources to the National Customs Service in Ireland to prevent the entry of IAS through the ports.

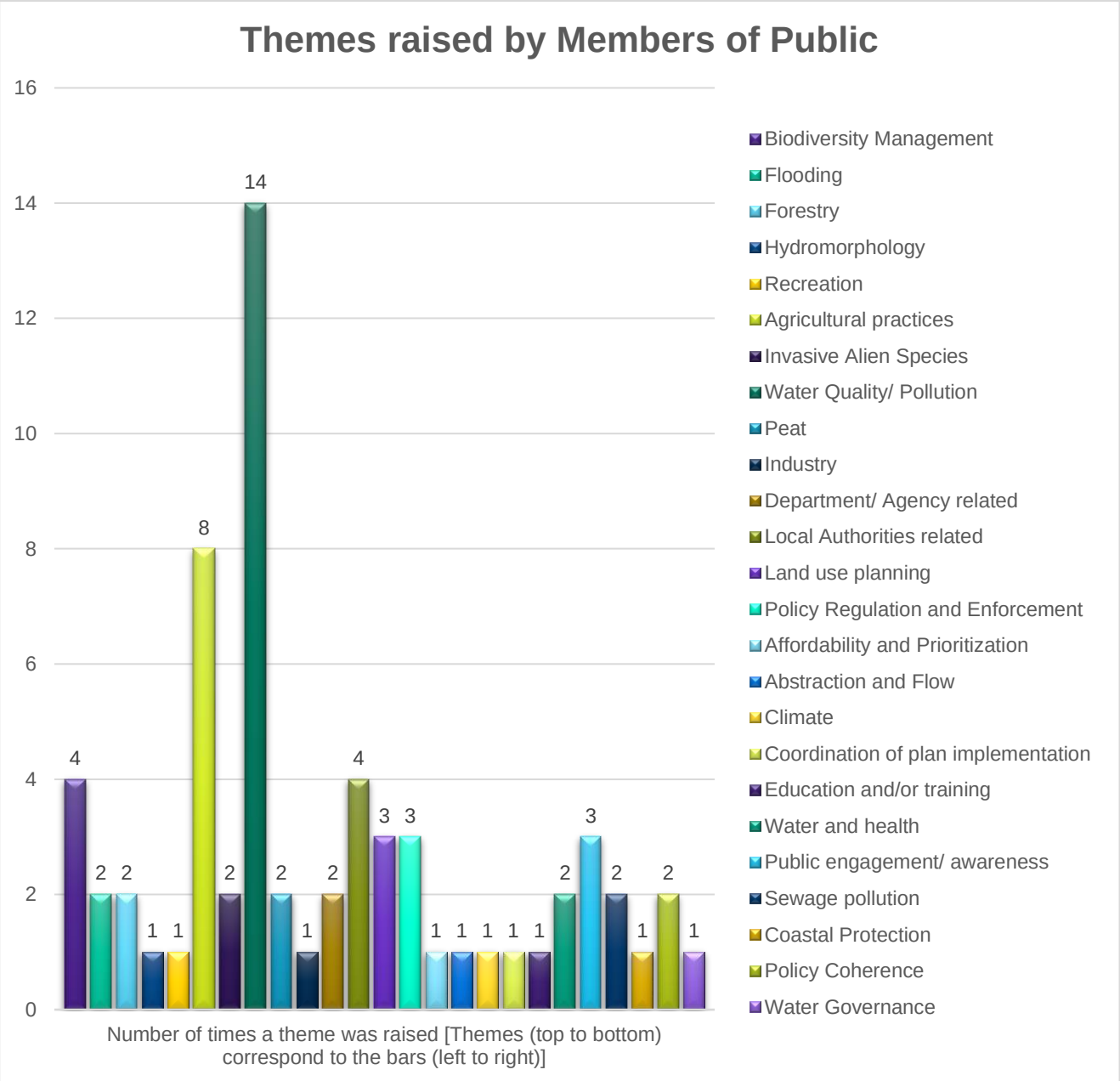

Figure 5-5: Frequency of the themes raised across submissions from Members of Public.

5.7 Political Party

One political party made submissions in relation to the RBMP approach and implementation. **Error! Reference source not found.** at the end of this section is the representation of the frequency of various themes raised by this consultee group.

5.7.1 Approach of the plan

The RBMP should be complemented by a “Biodiversity Net Gain” approach to planning in the areas of our river basins. The goals outlined in the draft RBMP in relation to reducing pressures on water quality from nitrates and other agricultural processes are welcome but will require a credible set of incentives and enforcement measures to be successful. The RBMP must ensure that a joined-up approach is taken to the preservation of water quality and wastewater management.

5.7.2 Plan Implementation

A single lead agency must be identified and resourced adequately to monitor and uphold key performance metrics for successful implementation of the plan. The Plan should also outline how lead agencies will collaborate with Irish Water to ensure that wastewater infrastructure which is overcapacity and has the potential to contribute to water pollution is identified and prioritised for upgrade works.

6 SPECIFIC REQUESTS

As highlighted in the previous sections, within the 259 submissions reviewed, some contained specific requests in relation to the draft plan. For ease of reference, these have been collated and are provided in Table 6-1.

Table 6-1 Specific Requests for the Draft RBMP 2022-2027 from Submissions Received.

Submission Seq. No	Consultee	Requests
011R	Swords Pickers	The final RBMP 2022–2027 will need to identify specific actions, owners and timelines against every gap identified throughout the report.
		RBMP 2022-2027 should identify the lead agency within government with the role and the powers to compel compliance with environmental legislation, across all arms of central and local government and all of society. Fund them accordingly.
		RBMP 2022-2027 should recommend a Biodiversity Net Gain approach to planning that truly prevents significant habitat loss within river basins.
022R	Individual	A long-term sustainable solution for wastewater management and treatment is required for the Naul Agglomeration.
053R, 1344R, 1372R	Individual and Company/ Corporate	The three Actions relating to the aquatic IAS that are not brought forward from the 2nd cycle should be included in the current plan.
		Re-establish the all-Ireland Invasive Species Ireland (ISI) Forum that operated between 2006 and 2013, jointly run by NPWS and NIEA. The collective expertise brought together by this Forum advanced knowledge in relation to IAS both nationally and internationally and mitigated the introduction and spread of IAS during this period. Its dissolution because of a lack of a miniscule amount of funding has permitted the advance of IAS into and on the island of Ireland to go unchecked.
072R	Corrib Beo Partnership NGO	A strengthened funding model is needed so that River Trusts and catchment groups are resourced to be active participants in the 46 catchment plans design and delivery (RBMP sections 5.3; 5.3.2; 5.3.3 and 5.4.9)
		Irish Water should install tertiary sewage treatment plants for all towns and villages in the coming decade. Domestic waste-water treatment systems need to be inspected and where upgrades are needed, the inspectors' advice must be enforced. New applicants should have access to a fund to assists homeowners in upgrading their domestic wastewater treatment systems. (RBMP sections 5.4.4 & 5.4.6)
		The final RBMP should set out a Governance and funding roadmap for how Catchment groups /Trusts can work effectively with Statutory bodies at the catchment scale during the next cycle.
150R	Individual	The plan must be far more ambitious and include targeted measures to restore ALL waters to healthy status by 2027 and halt deterioration.

Submission Seq. No	Consultee	Requests
		The plan must be far more ambitious and include targeted measures to restore ALL waters to healthy status by 2027 and halt deterioration.
447R	Individual	The next RBMP should identify the lead agency to help improve the status of all the rivers in Ireland.
1022R	Individual	The Plan needs to advise that EPA should act as a wholly independent water quality assessor, neither it nor the Department of Housing should be involved in local ASSAP groups.
449R	LAWPRO	The plan should reflect fundamental principles of how the 46 catchment plans are to be developed needs to be determined by DHLGH prior to preparation of the template by LAWPRO. It should also determine whether or not these are statutory plans (as sub-plans to the RBMP) and if they require SEA and AA.
		One plan be piloted in each of the five LAWPRO regions once the template has been agreed and published.
		Additional ring-fenced resourcing for GAP compliance needed.
		There is a need for a suite of measures to address the impact of combined storm overflows, including nature-based catchment solutions and a mechanism to provide support for implementation."
		Bespoke data management system needed where all relevant data is retained for controlled access by relevant bodies under the RBMP.
		Supports for mitigating hydro morphological pressures should be given higher consideration in the Plan and should be informed by the findings of the River Restoration Framework led by the EPA and the Review of Heavily Modified Waterbody Designations currently out for public consultation and due for inclusion in the final RBMP.
		Consideration should be given in the plan to review and address conflicts between WFD objectives and the requirements of the Arterial Drainage Act, as well as agricultural land reclamation and agricultural drainage practices.
		A national water literacy campaign to be developed and implemented throughout the 3rd cycle to support the RBMP and encourage buy-in from the public and in particular the relevant pressure owners.
		Consideration should be given to the timeframe of NIEA's work programmes in an attempt to align concurrent work in the associated shared waters.
		The Shared Waters document proposed to accompany the plan requires further progress. It should also elaborate on the (yet largely unknown) potential impacts of Brexit.
		With regard to aquaculture, the farming of Pacific oysters is currently unregulated in Lough Foyle as a result of jurisdictional issues, whereas in Carlingford Lough, production 'north' of the shipping channel is licensed by DAERA, and 'south' of the channel by DAFM. The plan should reflect that and be supportive of DAFM in any attempt to address this matter.
		The Sewage Sludge in Agriculture Regulations and the Water Pollution Act need to be updated.

Submission Seq. No	Consultee	Requests
		More regulatory oversight needed regarding agricultural land restructuring activities, with a focus on drainage and drainage maintenance, the latter being an unaddressed topic with fears that it is being used a loophole to avoid environmental controls.
		The grant criteria are currently too narrow, particularly the requirement for the system to have been registered before the registration deadline. Clarification is needed on whether DWWTS in new Areas for Action for the 3rd cycle, which are to be led by LA's or other non-LAWPRO agencies, will be eligible for the grant.
852R	Cork Co. Council	RBMP 2022 should provide clarification on the role of LA and IW in relation to Drinking Water Source Protection.
		Review of Waste-Water Discharge Licenses needed.
		Need for continued investment in natural water services in urban areas, as urban surface water run-off pressures increase.
		Legislation at present is inadequate to allow appropriate assessment of environmental impacts of agricultural drainage, with lack of transparency where agricultural drainage development takes place.
		The plan should establish a clear differentiation between streams and farm drains for farmers, while legislation at present is inadequate to allow for appropriate assessment of environmental impacts of agricultural drainage, with the lack of transparency where agricultural drainage development takes place.
		The plan should establish a clear differentiation between streams and farm drains for farmers.
		Water Pollution Act (1977) needs to be reviewed and updated.
859R	Mayo Co. Council	Figures 7 and 8 in the draft plan should be expanded or developed to show clearly who is represented at each level /governance body/committee together with details of their roles and responsibilities. In addition, the linkages between the Regional Committees and the other governance tiers should be improved, to share progress and challenges at a national level.
		Include actions to improve data capture in relation to unassigned waterbodies that are discharging into transitional and coastal environments.
		The S.I. No. 684/2007 – Wastewater Discharge (Authorisation) Regulations 2007 certification system should be reviewed, to ensure that nutrient inputs from small urban wastewater treatment plants are monitored so that nutrient removal upgrades can be programmed by Irish Water and where necessary, with current obstacles for receiving grant assistance should be reviewed.
		The draft plan may need to be cognisant of new world pressures from external factors i.e., war in Ukraine, that has led to unintended consequences such as an increase in cost of diesel and bagged fertiliser. This may change the way in which organic fertilisers are used and could lead to impacts arising from land spreading practices.

Submission Seq. No	Consultee	Requests
		Delivery of an awareness campaign to provide guidance to the community and landowners on land management practice should be considered as an action in the 3rd Cycle Plan.
		The section in the Draft Plan referring to Hydro morphology lacks the level of detail required to address this problem which has obvious connections with other significant pressures such as agriculture and works carried out under the Arterial Drainage Act.
		Include a measure suggesting expansion of Farm Payments for Ecology and Agricultural Transitions along with practical guidance on siltation reduction measures in peat harvesting catchments.
		Actions which should be considered in the RBMP include the use of Surface Water Drainage and Sustainable Urban Drainage Systems to address natural drainage issues in larger towns, together with the use of Nature Based Solutions to address urban pressures in towns and villages.
		Establishment of an Invasive Alien Species Working Group with findings shared with all stakeholders.
864R	Leitrim Co. Council	Septic Tank Grant should be given to all households that wish to upgrade their septic tank and thus eliminate/minimise the risk of pollution.
		Consideration should be given to the construction of strategically located anaerobic digestors for public use by the farming community to dispose of excess slurry.
		Government should consider the withholding of grant / subsidy payments to forestry developers where licence conditions are not met, similar to cross compliance in the farming sector. When issues arise, greater collaboration between the Forest Service and Environment Department of Local Authorities is required.
		MCPA needs to be banned by the Department thus eliminating the risk of these pesticides especially in poorly drained soils and runoff to the nearest stream/river/lake.
		Wastewater treatment facilities need urgent attention and a programme of works with a lead authority like Irish Water to manage these facilities.
		Trade effluent discharge licencing legislation is very old and needs to be reviewed. Updated guidance and training should be provided to all to Local Authorities to assess new applications and review existing discharge licences.
867R	Kilkenny Co. Council	Require a catchment scientist on the environment team and additional technical staff with agricultural background.
		A protect function staff resource will be required to undertake monitoring of AFAs n Kilkenny post completion of restoration works by LAWPRO.
		An urgent review and overhaul of the Local Government Water Pollution Act (as amended) and legal framework is required.

Submission Seq. No	Consultee	Requests
		There needs to be better co-ordination of farm inspection between both the Local Authority and the DAFM in consultation with LAWPRO under the draft RBMP 2022 to 2027.
		If the local authority could be afforded some limited flexibility to offer grants to homeowners following failed inspection (NIP type inspection) in certain circumstances, then that approach would be consistent with the water quality objectives in the draft RBMP 2022 to 2027.
		There are currently a small number of specific WWTP problem locations that could be targeted for investment and capacity upgrades in Kilkenny within the lifetime of the draft RBMP 2022 to 2027.
		An increase of over 100% in the number of septic tank inspections from 2021 would necessitate an additional NIP inspection team member on the basis that 2 No. staff minimum would be required for each inspection.
868R	Clare Co. Council	It is positive that measures are to be put in place to ensure the additional evidence required to determine if water bodies are 'At Risk' can be obtained.
		It will be important that adequate numbers of trained staff and a robust reporting structure is put in place in Local Authorities in a timely manner in order that the work can commence soon after the 3rd cycle of the plan comes into operation.
		Appropriate planning conditions should be considered to mitigate climate change such as encouraging sustainable goals.
		Review to be undertaken of the Local Authority Waters Programme and Wider Local Authority Structures to inform their evolution and identify the appropriate level of resources and involvement required from the sector to meet WFD objective
		Local Authorities require more resources and support for increased implementation of The Good Agriculture Practice for the protection of Water Quality Regulations and the Water Pollution Acts.
		Enhanced measures to oversee land and river channel alterations are welcome and very necessary. It is necessary that all bodies (including Local Authorities who carry out this work have to follow a strict Code of Practice to eliminate a negative long-term impact on water quality.
		Unsewered villages are a risk to water quality and require major investment to eliminate this risk.
870R	Meath Co. Council	RBMP should be more explicit on the link between expansion and intensification in the dairy sector, increased phosphate and nitrate fertiliser use, and increased N and P loads in Irish rivers.
		Meath County Council questions the effectiveness of the central state structure, which relies on voluntary and confidential engagement with an advisory service, to reverse widescale deteriorating water status.

Submission Seq. No	Consultee	Requests
		The Arterial Drainage Act should not be allowed an effective veto on options for appropriate remedial measures to address hydro morphological impacts in catchments, where such options can be shown to be otherwise suitable and cost-effective measures.
892R	Meath Co. Council (2)	RBMP 2022-2027 should include clear guidelines and targets for consultation phases at the sub-national level.
893R	Dublin City Council	Figure 18, 3rd Cycle Areas for Action. The Santry River Restoration and Greenway Project falls into all three categories and could be considered as an exemplar for (urban) river catchment management.
		More emphasis needed in the plan on delivering actions on the ground.
		[Section 5.4.5 Action: DHLGH to amend the existing Bathing Water Regulations (S.I. NO. 79 of 2008) to provide discretion to local authorities on determining the bathing season for individual bathing waters] Unclear how this objective will help improve bathing water quality in Ireland.
		A review is needed of heavily modified water bodies, with clarification required for 'good ecological potential'.
		Impact of urban run-off needs to be recognised as far more significant than is acknowledged in the draft Plan (e.g., USEPA NURP report), with list of supplementary measures needs broadening to include nature-based solutions.
899R	Limerick City and Co. Council	Clarification on the required balance between enhanced enforcement and awareness that is intended in the final RBMP.
		Any enhancement in planning guidance should be published under Section 28 of the Planning and Development Act to ensure a statutory footing and a methodology should be outlined to implement a catchment-based approach to policy across Local Authority Development Plans.
		Resources be provided to the Forestry Division of DAFM to ensure mitigation measures are implemented, as well as conditions on licenses issued by the DAFM include a requirement for the relevant Local Authority to be contacted prior to commencement of works to help ensure best practice is being implemented and allow the opportunity for inspection.
		Recommends that for the assessment of funding applications under the National Development Plan that a criteria be included which assesses the potential benefits to improving and protecting water quality.
		Multi-annual funding be provided for predicted duration of the control works because of long term-term nature and control and eradication.
		Standards for agricultural best practice requirements and on-farm effluent facilities be better implemented, with mandatory licensing regime and development of an environmental on-farm works training programme.
		DHLGH should consider developing statutory technical standards for sustainable drainage measures for new and retrofitted developments where planning is required, while awareness and education of the impact of land drainage on water quality among agricultural community be improved.

Submission Seq. No	Consultee	Requests
		Clarification should be provided on the required governance structure within Local Authorities to successfully implement NBS, specifically regarding the coordination role that will need to be provided by the WFD Regional Organisation Committees.
		The draft RBMP does not clearly identify the investment supports for Local Authorities to implement projects that include water quality objectives.
464R	Galway City Community Network	The draft RBMP should set out clearly how the State will protect and improve the water quality in all waters so that we can achieve good ecological status by 2027 at the latest.
		Urgent action is required for to address the issue with the overflows on the wastewater network in Galway City which overflow during rainfall events which are of a lower intensity.
		Merlin Park Woods rivers on the east of Galway City should be restored and removed from the storm drain systems.
		In section 5.4.5, on page 67, the action (The National Bathing Water Expert Group to undertake a project to...bathing season in Dublin Bay) refers to 'Dublin Bay' and GCCN/GEN believes that reference should be changed to ‘Ireland'
		In section 5.4.5, on page 67, the action (DHLGH to amend...individual bathing waters) above indicates that Local Authorities should have discretion in determining the bathing season. GCCN believes the above action will have an unintended consequence if they have discretion, they will maintain the shortest possible season for measuring water quality to avoid the wetter winter months when there is increased surface water run off which can contribute to lower quality results.
		The plan should propose that the bathing quality should be measured all year round and the full year should be made the mandatory season for all local authorities.
861R	Inishowen Rivers Trust	Water quality and biodiversity should be brought to the forefront of agricultural policy (Draft RBMP section 5.4.1).
876R	Roscommon Environmental Network	The River Basin Management Plan must be science-based. It must include a full set of targeted measures, linked to pressures, necessary for every waterbody to achieve WFD objectives of at least good status by 2027, with no deterioration. These actions must be specific, measurable and time-bound, with the responsible body assigned and accountable.
		Section 6.3 of the plan fails to mention how the consultation responses will inform the finalisation of the plan.
		RBMP 2022 should suggest issuing of regulations under the Water Pollution Act to improve water management concerns.
		Plan does not address the policy conflict between agriculture targets and meeting the objectives of the WFD.
		The use of “Nature Based Solutions” should be a key part of the RBMP response to flooding.

Submission Seq. No	Consultee	Requests
		The Plan is far too weak on nutrient pollution. Despite the failure of current regulation and policy in addressing this, the draft Plan proposes no additional systemic measures beyond the revised Nitrates Action Programme and CAP.
		The Plan relies heavily on the voluntary ASSAP initiative, which provides no funding to farmers for water protection measures. A comprehensive regulatory, voluntary and combined programme of measures, with supports, is required to reverse pollution impacts.
		The Plan is not strong enough in addressing sewage pollution and does not set out measures to fix this by WFD deadline of 2027.
		The lack of identified pressures on transitional and coastal (TRAC) water bodies and targeted measures to address them, makes it unlikely that the status of TRAC water bodies will improve by 2027.
		The plan must include a chapter on coastal issues - identifying the pressures specific to coastal waterbodies and include targeted measures to address them and establish priority habitat restoration zones.
1046	Individual	The original wetland habitats along the final stretch of the river from Loughlinstown N11 Bridge to the shore are deteriorating and there seems to be no official Restoration Plan for Loughlinstown Common which has remained at pNHA status for many years.
		Sewage issues arise in the Dargle River which have an impact on Killiney Bay along with the Bray/Shanganagh Wastewater Plant.
212R	Individual	The plan should propose a measure to make grants available for farmers to implement natural buffer zone of 5 to 10 meters of native species along all riverbanks to stop run off.
966R	Individual	River modifications such as culverting and straightening must end. The short-term benefits of immediate flood relief and drained land for development are outweighed by the long-term negative impacts through erosion and sediment transport downstream, habitat destruction and loss of amenity. The draft plan should consider this issue and propose appropriate measures.
1025R	EPA	It is essential for the draft RBMP to ensure that the roll out and development of the catchment management plans is supported and resourced and that there is clarity about their role, ownership, and oversight.
		It is essential that the final plan addresses that given the short cycle and impacts of the Covid pandemic it is not yet clear what measures are, or are not, working in the Priority Areas for Action and what actions have been closed out.
		A review of the Blue Dots Programme and the measures required should be undertaken during the cycle to ensure that progress is being made and that any measures or changes required in national policies or programmes can be implemented rapidly.

Submission Seq. No	Consultee	Requests
		More emphasis is needed in this cycle on measures to address protected areas and to ensure suitable measures and standards are in place and achieved to protect public health.
		The Plan should consider that more action is needed to ensure that householders fix systems that fail inspections and to improve overall public awareness to encourage good practice.
		There needs to be a commitment in the plan to incorporate the nature-based solutions guidance into all county development plans, and to finance such solutions.
		The Plan should be more ambitious and should include specific measures to prevent hazardous substances entering our waters.
		The final RBMP should aim to leverage the proposed measures of National Hazardous Waste Management Plan (NHWMP) 2021-2027 in relation to management of hazardous wastes to deliver water quality improvement.
		The action in relation to addressing incidents related to forestry operations should be strengthened in the final Plan to focus on prevention of incidents though closer supervision and oversight of operations particularly in highly sensitive areas by DAFM.
		It is important that all the schemes set out in the Plan related to peat restoration and rehabilitation are monitored and evaluated at appropriate level, and that lessons learned and implemented on a wider scale.
		The final plan should highlight the need to link to the work done on land use review. The guidelines for the incorporation of the Water Framework Directive (WFD) into the planning system should be finalised and rolled out as soon as possible. Extensive training and awareness for planners and developers will be required to ensure it is fully implemented.
		Furthermore, the impact of developments on water quality should be integrated into all regulatory planning and development frameworks, for example, for forestry, aquaculture, foreshore and marine planning.
		The level of commitment by DAFM to implementing the actions proposed for the aquaculture sector needs to be stronger in the final Plan.
		It is important that the action to update the designations of Nutrient Sensitive Areas in legislation to allow their consideration in licensing decisions is completed without delay.
		Section 2.6 of the draft plan should also clearly address how the findings of the SEA Environmental Report have been integrated in the Plan. Any future amendments to the Plan should be screened for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan.
		Chapter 8 of the SEA Environmental Report includes an extensive list of detailed mitigation measures. It is important that the recommendations of the SEA Environmental Report are fully integrated into the Plan, or if not the case, an explanation provided as to the reasons for not including them. Likewise, the mitigation measures

Submission Seq. No	Consultee	Requests
		from the appropriate assessment should be integrated into the Plan. The Plan should also provide a clear indication of how these mitigation measures will be implemented.
		If the monitoring identifies adverse impacts during the implementation of the Plan, DHLGH should ensure that suitable and effective remedial action is taken.
		The implementation of the Plan should include provisions for annual reporting on implementation of the Programme of Measures. The Plan implementation, monitoring and reporting should be aligned with the environmental monitoring and reporting required under the SEA legislation.
		Both SEA ER and the Plan would benefit from the inclusion of a schematic showing the hierarchy and inter relationships of the other relevant plans and programmes, e.g., Nitrates Action Programme, Irish Water plans, etc.
		Additional requests are made in relation to the SEA ER. See Section 5.1.18.
880R	Green Bridge D8	Suggested project for delivery under RBMP: Potential for enhancement project for Dublin's River Poddle (one of the local rivers that is targeted for restoration in the draft plan). The Poddle, through its long association with the Liberties, must be a prime candidate for rejuvenation. A new mill pond could easily be created by opening up the encasing culvert, followed by construction of a small dam, allowing a pond to form.
461R	Save Cork City NGO	Draft RBMP does not acknowledge Ireland's failure to correctly transpose and comply with the provisions of the Water Framework Directive (2000/60/EC).
		Lack of measures/actions for overall regulation on activities e.g., dredging, clearance and building of drainage led containment structures is in contravention of the WFD.
		It is recommended that under the final plan, an overriding body operating within a legal framework which requires prior authorization or registration, based upon general binding rules under the relevant Directives, Laws and guiding Conventions to manage the process of instream works proposed including the replacement of the Arterial Drainage Act with an updated legal framework for instream works.
		There is a need for transparency within the final plan as the plan has elements of confusion/repeat information.
		Pg.49 'Programme of Measures – how we protect and restore water' - Does it mean: how we would like to protect water, how we currently do, or perhaps what we would do if we were effective?
		Pg.49 'Programme of Measures – Why are all the actions that may achieve outcomes not listed in one location and challenges not grouped together also?
		Pg.49 'Programme of Measures –Why is there no list of interested bodies in one place.
		Drainage policy of river canalization in Ireland contributes to pollution of waters - this needs to be listed clearly within issues of concern and addressed better within the plan.
		Up to 30 % of waterways are still not classified by the EPA in Ireland. This needs to be addressed in the plan.

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		RBMP needs to list and adequately explain/address the Floods Directive, SEA Directive, EIA Directive, Aarhus Convention and Granada Convention
		Inadequate consideration has been given to the maintenance and/or restoration of floodplains. Much of the Floods Directive not considered adequately - RBMP needs to be clearer and more upfront on the matter.
855R	ICMSA	Additional regulations put in place in regard to forestry must not act as a major dis-incentive to forestry.
		ICMSA would like to see more promotion of the ASSAP programme to the public highlighting its contribution to improved water quality and highlighting the farmers voluntary involvement and enthusiasm.
854R	Birdwatch Ireland	Lack of ambition in the draft RBMP to meet any requirements of the WFD. Lack of targets is worrying for the future of migratory and resident waterbirds and birds of riparian habitats.
		Plan does not propose any targets for actual improvement of water quality over the time frame presented and actions that are proposed are general.
		BirdWatch Ireland asks the authors of the draft RBMP to study the 'Irish Wetland Bird Survey: Waterbird Status and Distribution 2009/10-2015/16' publication in relation to the impacts of poor freshwater and coastal water quality on wild birds, and the impacts of eutrophication/nutrient enrichment in particular.
		Draft RBMP fails to mention water-dependent habitats and species. Efforts in planning for water infrastructure should aim to achieve favourable conservation status for water-dependent habitats and species.
		Despite the failure of current regulation and policy, the draft plan proposes no additional systemic measures beyond the revised NAP and CAP Strategic Plan.
		Plan does not set out how tightening of regulations and enhanced enforcement will address pollution and restore degraded waterbodies. It does not contain targeted measures to restore impacted waterbodies.
		Draft plan lacks targeted, outcome-based actions and is not in line with either the WFD or the Programme for Government or the legal obligations of the Birds and Habitats Directives.
888R	Irish Wildlife Trust	The draft RBMP fails to meet basic legal compliance with the WFD, i.e., achieving at least ‘good status’ in all water bodies by 2027. Urgent policy coherence is required.
		Draft RBMP (Pg.21) acknowledges that the plan must include measures to protect/enhance each of the 4,842 waterbodies. However, only 527 areas selected for ""focused attention"" (Pg. 54). The rationale here is not explained.
		Arterial Drainage Act is outdated and the OPW should not be in a position where it is simultaneously the architect and ‘competent authority’ for its works. Both require urgent reform.
		The section of the RBMP on Forestry is particularly weak given that this is the primary pressure on high status water bodies. Restoration of ecologically functioning, native forests will benefit water courses.

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		The RBMP ignores the coastal zone which is not acceptable - the plan should support the establishment of an inshore area free of bottom towed-fishing gear as well as the creation of robust MPAs, including no-take zones.
		The RBMP does not adequately deal with aquaculture - Address the poor monitoring and data availability on the pressures from aquaculture as they apply to WFD status.
458R	IFA	It is important to acknowledge that due to delays implementing the 2nd RBMP, the majority of the actions taken by farmers were not captured in the assessment of water bodies for the period 2013 – 2018.
		RBMP must fully acknowledge the investment being made by farmers to protect and improve water quality and ensure that time is given to accurately evaluate the effectiveness of these measures.
		Many farms are financially vulnerable - IFA suggests the development of a comprehensive financial strategy to support the implementation of measures in the RBMP including Accelerated Capital Allowance schemes.
		A more detailed plan is needed to outline measures in the NAP and new Green Architecture in the CAP Strategic Plan that will deliver a 50% reduction in nitrogen loss. This needs to be developed in consultation with farmers and include a financial package to support implementation.
459R	SWAN	The ambition for the RBMP must be fully compliant with the WFD, as committed to in the Programme for Government. It must be science-based and include a full set of targeted outcome-based measures, linked to pressures, necessary for every waterbody to achieve WFD objectives of at least good status by 2027, with no deterioration. All actions must be specific, measurable, and time-bound, with the responsible body assigned and accountable.
		Additional and more targeted measures for the integration of climate change scenarios should be included and adequately resourced within the plan and all proposed measures in the plan should be climate proofed under a range up to 4°C warming.
		Initiate medium-term process of developing a consolidated Water Act, with budgets, timelines, management units and sanctions to mainstream water protection in government policy alongside climate and biodiversity action and fix the fragmented water governance system.
		The RBMP must provide for the monitoring and strict limiting of total catchment imported N (fertiliser and feed) in catchments already saturated, based on EPA analysis. Certain sub-catchments should be zoned ineligible for certain stocking rates, if necessary, based on catchment carrying capacity.
		The RBMP should commit to WFD-specific assessment in advance of developments potentially impacting waterbodies, e.g., dredging, drainage and flood protection. Projects can only go ahead if it can be demonstrated that WFD objectives will not be compromised.
		The RBMP should include a prohibition on wetland drainage and commitment to a national river and wetland restoration programme. This must include coastal wetlands and blue carbon habitats.

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		The plan should include a review of the impacts of arterial drainage; and a commitment to review and amend the Arterial Drainage Act 1945 to remove the requirement to maintain drainage and to bring it into compliance with EU environmental law.
		As a minimum, the plan should introduce a prohibition on afforestation on peat soils in acid sensitive headwater catchments, as recommended by the Hydrofor research project.
		The RBMP should include a chapter on coastal issues which identifies the pressures specific to coastal waterbodies and includes targeted measures to address them. Establish priority habitat restoration zones, with a priority focus on 'blue carbon' habitats, with targets for restoration included in the final plan.
		Carry out an independent legal review of NPWS guidance on the licensing of aquaculture activities within Natura 2000 sites (15% threshold for likely disturbing activities).
		The plan should include a commitment for the urgent development of integrated sub catchment management plans, with targeted measures, for ALL high-status objective waterbodies. These should follow the 'Threat Response Plan' approach and include emergency response plans to save the 20 remaining pristine waterbodies.
		Update and legally publish the sub-basin plans for the critically endangered freshwater pearl mussel.
		The plan should include measures for all waterbodies at risk from abstraction and should include a commitment to the establishment of a comprehensive, publicly accessible National Abstraction Register which includes all abstractions greater than 10m3/day and a licensing regime for all abstractions greater than 20m3/day, in line with Northern Ireland.
		The RBMP should set out specific measures to restore the 188 waterbodies "that have a significant impact from domestic wastewater.
		The range of pressures acting on cross border waterbodies should be identified in the final plan, a description of how the jurisdictions will work together to address the identified issues should be included.
851R	An Taisce	A full critique of the measures put in place during the second cycle was not included with the consultation documentation. This information is vital for an honest and competent response.
		An Taisce believe the establishment of a centralised WFD/RBMP project management unit which would be responsible for oversight, monitoring and assessment of WFD implementation would be beneficial.
		Empirical evidence that programmes such as LAWPRO and ASSAP are achieving water quality gains is sorely lacking in the draft plan.
		An Taisce believe that selecting only certain areas for targeted action, as proposed by the draft plan, is ecologically inadequate and is not legally compliant with the WFD. All waterbodies should be included in the areas for further action within the RBMP.

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		The RBMP does not address the policy conflict between agriculture targets and meeting the objectives of the WFD.
		The RBMP must provide for the monitoring and strict limiting of total catchment imported N (fertiliser and feed) in catchments already saturated, based on the EPA analysis.
		An Taisce have already provided a detailed critique of the NAP as part of the public consultation, and this should be read in tandem with this submission on the RBMP.
		An Taisce wish that the inadequate protection offered under the NAP and GAP regulations be addressed in the RBMP. Any measures proposed should have been supported with an evidence base that they would provide the necessary reductions in nutrients, but this was sorely lacking in both the NAP and the CAP. It is vital that these weaknesses are addressed.
		An Taisce highlight that there is no indication of how existing programmes and measures will restore waters polluted or damaged by forestry. The RBMP claims that “significant changes” as a result of legal rulings are having “a significant effect in terms of further strengthening the protection of water from forestry-related sources”, but An Taisce have not seen any evidence that this is the case.
		The RBMP should Include robust measures to address legacy forestry.
		Incorporate a WFD specific assessment into the licensing process for afforestation, with catchment sensitive mapping imitated as a condition of novel comprehensive cumulative assessment approach to afforestation.
		An Taisce believe the draft plan is far too weak in terms of measures to address urban wastewater pollution - see SWAN recommendation on the Irish Water Investment Plan.
		The draft RBMP only provides for the “development of new standards for Combined Storm Overflows”, failing to offer specific measures to address shortcomings and failing to specify the number of waterbodies which are un-assessed and/or below the required standard.
		An Taisce believe that the plan is not adequate in terms of its ambition or sense of urgency for the restoration and protection of high-status waterbodies/sites - see SWAN recommendations.
		Clarification is needed in the final RBMP as to which works/development will be subject to WFD prior authorisation under the proposed Controlled Activities for the Protection of Waters regime, and which activities will fall under the new W&P guidelines.
		The RBMP must address the existential threat of climate change and transformative change needed in Irish land use policy to mitigate and adapt in the face of climate system changes.
		Final plan should include a chapter on coastal issues, with identified pressures on transitional and coastal waterbodies addressed.

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		An Taisce is greatly concerned with arterial drainage impacts and the plan lacks analysis on the damage caused to rivers. A complete review of how arterial drainage is managed is needed, including emphasis on multifunctional floodplain management.
		Plan should include measures for all waterbodies at risk of abstraction, with would include the establishment of a National Abstraction Register with relevant appropriate thresholds in place.
		In Section 6.5.4.1, the NIS for the RBMP should contain the recommendation that given the scale of derogations under previous cycles of the NAP and the significant potential for in-combination effects, any derogations which emerge from the NAP will be subject to AA, which should include a robust assessment of in combination adverse effects. If the risk for eco-hydrological pathways exists for Natura 2000 sites, and has not been mitigated for, by extension this has very serious ramifications for achieving WFD status in these same waterbodies. Any site-specific application for a Derogation should be subject to AA Screening and Article 4 WFD assessment.
		An Taisce argue that given the risk has been clearly identified in the NIS and SEA, the lack of a specific measure in the RBMP calling for a site level assessment of a derogation is a dereliction of duty by the Department, in contravention of Article 5 of the Surface Water Regulations 2009. It is imperative that this be an explicit action under the agriculture section of the RBMP.
		In order to provide a more robust RBMP, the mitigation measures and recommendations proposed in the NIS should be incorporated as actions in the RBMP itself. They should be front and centre in the RBMP in order to translate into actionable measures.
		Section 6.4.4.3 outlines a potential pathway for damage to Natura 2000 sites through proposed restoration measures and in relation to mitigation, states that ""The risk assessment will include the requirement to engage with the AA process"". An Taisce express significant concern at this proposal and request that it should be clearly indicated that the AA process is a legal obligation.
		Any such restoration measures must be subject to the full rigour of the AA process, with any screening out based on robust evidence and expert opinion, and it should be fully transparent and include public participation as required under the Aarhus Convention.
891R	An Fóram Uisce	***An Outcomes-based Approach***
		The Forum recommends an increased focus on the planned and projected WFD outcomes for the next cycle of the RBMP, where each water body is considered separately with an associated RBMP outcome and that the means and timing of achieving these outcomes are clearly stated.
		The Forum recommends that the RBMP and the 46 Catchment Plans include targets, metrics and key performance indicators (KPIs) for each water body, grouped by sub-catchment (as proposed on Box 1).

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		The 'right measure right place' objective will need to be directly applied to the development of targeted protection / mitigation measures for every water body, focusing on the impact we want to have, i.e. protect or restore. Furthermore, there should be transparency in the development of these targeted measures and the decision-making around how they can be implemented.
		To support the development and decision making of targeted measures, the Forum recommends that training on EPA PIP maps is provided by the EPA to all implementation bodies of the RBMP, which should outline the basis and value of EPA PIP maps as a guidance tool to support decision-making and development of targeted measures.
		Along with estimating timelines for water bodies to achieve their WFD objectives, intermediate milestones which can indicate improvements and direction of travel should also be included. The proposed table (Box 1) would ensure transparency and accountability for the 3rd cycle RBMP, along with realistic expectations of what can be achieved. Clarity is also needed where exemptions apply for any water bodies.
		Along with inclusion in the 46 Catchment Plans, the proposed table (Box 1) should be made publicly available through catchments.ie. Water quality and pressures information should be made available in graphical and map-based formats, allowing active catchment groups and stakeholders to have up to date information on water bodies and catchments.
		Monitoring and Evaluation
		The Forum recommends that proposed measures and actions of the RBMP should be monitored annually to assess implementation, while the interim outcomes for water bodies (such as water quality) should be reviewed every two years to ensure we are seeing real progress towards meeting the WFD objectives.
		The Forum also recommends that there is transparency in the monitoring and evaluation of the RBMP, with the outcomes of these reviews made available to the public, for example through catchments.ie.
		Governance
		The Forum would like to emphasise the need for transparency across all levels of governance of the RBMP (decision making, meetings, monitoring and evaluation, access to data and documentation) which currently is not adequate.
		The Forum recommends that a table should be added to the RBMP outlining who is represented on each governance body/committee, how often they meet, along with their roles and responsibilities.
		Furthermore, there should be a common repository for all reports and meeting minutes from the different implementation bodies to increase transparency and opportunities for knowledge sharing between the three tiers.
		The Forum recommends that structured engagement should be established between the Forum and WPAC, and also between the Forum and the NCMC, so members receive updates on progress and priority work areas

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		with WPAC/NCMC, and also share stakeholders' perspectives and key issues raised by Forum members to allow input into policy development. Figure 8 on Page 20 in the draft plan should be reviewed to account for the required engagement between the Water Forum and the NCMC, and the NCMC and WPAC (as outlined in the TORs)
		The Forum recommends for continued engagement between the Forum and the Water Advisory Section of the DHLGH beyond the public consultation, with enhanced input into the implementation of the third cycle.
		There should be opportunities for structured engagement between the Forum and all tiers of governance, where the Forum's Executive should have access to documentation (e.g. meeting agendas and minutes) to ensure the Forum members are kept up-to-date on the implementation of the 3rd cycle.
		The Regional Operational Committees should be included as a sub-group of the Regional Committee Structures (Figure 8), along with details of their respective roles in catchment management.
		The linkages between the regional committees and the other tiers of governance should be improved, in line with the IPA research; there should be structured engagement between the Regional Committees and the NCMC to share regional progress and challenges at a national level. Furthermore, there should be opportunity for structured engagement between the Water Forum and the Regional Committees (e.g. bi-annually) to allow stakeholder input into implementation.
		A proposed measure should be added to the RBMP to establish a full-time project management secretariat for the successful implementation of the 3rd cycle, in line with IPA research recommendations.
		Governance and Local Authorities
		The Forum is of the view that in order to maximise the impact of enforcement and compliance to support WFD objectives, there should be better alignment between the inspection regime of Local Authorities and the WFD objectives. The Forum recommends that a proposed action should be added to the RBMP to target local authorities' inspection regime for water protection / restoration, where staff should plan their annual inspection regime by targeting inspections to significant issues/pollutants of different water bodies.
		Every Local Authority should appoint a WFD Officer who can co-ordinate the implementation of the RBMP and strengthen alignment between the Local Authority work programmes to the WFD objectives.
		To ensure transparency and accountability, the Forum recommends that a section should be included in the RBMP (for example in Section 2.3), outlining the roles and responsibilities of the different sections within the local authorities in relation to water quality protection and restoration.
		The Forum recommends urgency in implementing the upcoming Planning Guidelines on the WFD, while emphasising the need for stakeholder engagement as part of the process. Training on the new Planning Guidelines for the WFD should be provided for relevant staff and decision makers involved in planning and WFD implementation.

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		The Forum recommends mandatory training be developed for Local Authority staff, across sections (environment, planning, roads, heritage, biodiversity, community and enterprise) to ensure that all activities that are carried out by the Local Authorities should support efforts to achieve the WFD protect objectives.
		Priority Areas of Action
		The Forum recommends that more detail is included in the final RBMP on the number of different water bodies that will be included in the PAAs, such as how many At Risk water bodies will be included in the PAAs.
		The Forum recommends that the need for adequately resourcing areas for action, including drinking water source protection, must be effectively communicated through Government.
		The Forum is supportive of the proposed measure for in relation to the Drinking Water Expert Group and the recast Drinking Water Directive and would welcome engagement with this Expert Group in the future in relation to this process.
		Financing
		The Forum recommends that the significance of adequately resourcing this RBMP is effectively communicated within Government, highlighting the urgency of addressing the water crisis, alongside the climate and biodiversity crises.
		The Forum recommends that there is an urgent commitment within Government to complete the proposed interdepartmental group to develop a comprehensive financing strategy to support the implementation of measures to deliver on the ambitious Water, Climate and Biodiversity objectives committed to in the Programme for Government.
		Public Participation
		The overall level of meaningful public and stakeholder engagement in the implementation of the WFD needs to radically improve. A new national approach to public participation needs to be developed that includes a vision and action plan for public engagement in the 46 catchment areas that encompasses the principles and recommendations set out in the Water Forum Briefing Note on public participation.
		A phased approach be taken in a number of pilot catchments to test various approaches to improving public engagement, contributing to the development of a new national approach. The Forum would welcome future engagement with the Department, Local Authorities and LAWPRO in the design and implementation of these pilots. These pilots should take place very early in the 3rd cycle so that more effective and more meaningful public engagement processes are in place for the remainder of the 3rd cycle.
		A framework will have to be developed to support the development and implementation of public participation dialogues, community action planning and project co-creation within and between Local Authority areas and within and between state agencies with responsibilities for water, climate and biodiversity.

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		Structures and resources (personnel, training and funding) need to be put in place to develop and deliver specific, measurable, actionable, reasonable and timebound actions plans that are prioritised by the public participatory process to deliver positive.
		There needs to be consistent, ongoing and informed discussion at local level that facilitates the co-creation of solutions and action (agency, community and individual) to protect our natural resources and build truly resilient communities across Ireland.
		National level A review of climate, biodiversity and water funding streams needs to take place (inter-departmental level) so that adequate funding is given to each sphere and active community organisations can be resourced financially to participate in catchment management and deliver on the agreed and prioritised catchment actions for water, biodiversity and climate.
		National level The current review of the Local Authority sector should include an assessment of the additional staffing requirements (and training) needed to provide for meaningful public participation in catchment management for water, biodiversity and climate, that should include providing ongoing expert support to communities delivering actions.
		Regional Structures A Framework need to be put in place so that agencies and organisations with statutory responsibility for water, climate and biodiversity can work together at local level for efficient and effective outcomes in all realms, possibly local operational groups (catchment-based) that would feed into the regional operational committees already in place.
		Establishment of regional stakeholder fora of key stakeholders including Rivers Trust, Catchment Associations, Group Water Schemes, and other relevant groups and individuals. The National Water Forum model can be used to establish a strategy for this, local fora could then be formed at catchment level.
		These regional stakeholder fora should engage with the Regional Structures such as the Operational Committees and Regional Committees. Community Water Officers should have a key role in developing and supporting these regional fora.
		Local Authority Structures Facilitating multi-stakeholder public participation requires the support of all sectors of the Local Authority; biodiversity, climate, environmental, tourism, heritage, tidy towns and PPN coordinators.
		Every Local Authority should create a plan identifying how they will integrate public participation outcomes across their work programmes and possibly lead or collaborate in project co-creation, planning and implementation.

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		Every Local Authority should establish a working group, ideally under the supervision of a Director of Service reporting to the Regional Committee, that includes their biodiversity, climate, environmental, and liaising with LAWPRO community water officers where water, climate and biodiversity as seen as equal pillars to prioritise actions for optimum outcomes in all spheres.
		These Local Authority working groups continue to provide support to communities to deliver actions on the ground for water, biodiversity and climate through the provision of scientific data and expert advice to facilitate effective plan implementation at community level and improved water literacy.
		Training needs to be provided to Local Authority and agency staff in community facilitation, participative and deliberative democracy approaches (e.g. Rivers Trust Ripple Process and Deliberative Democracy tools2) and as well as action planning and project implementation for positive environmental outcomes for biodiversity, water and climate.
		Training needs to be provided to Local Authority and relevant agency staff responsible for the assessment of funding applications for water, biodiversity and climate projects so that the project achieves positive environmental objectives and that it is financially reasonable.
		Training needs to be provided in stakeholder mapping and best practice in community engagement processes as identified in the Public Participation Policy Briefing Note prepared by the Water Forum.
		Expand the team of community water officers to a minimum of one per catchment area to support the work of community groups and act as a focal point for these groups to facilitate addressing of local issues and brokering liaison with relevant agencies when water quality or status issues arise.
		Community Level Adequate funding and resources need to be provided to active catchment groups giving them the capacity to develop projects and deliver actions on the ground and to facilitate participation.
		There needs to be better integration of funding streams available to community groups for action on the ground and it needs to be easily accessible without onerous administration.
		Agriculture
		The Forum recommends that the context for decision-making on the required targeted measures and actions should be provided in the form of an explanatory outline of source-pathway-receptor characterisation where the receptor and its requirements is at the core of the process.
		The Forum recommends that the measure to reduce Nitrogen losses by 50% is included in the final list of Proposed Measures, and that more detail is added to the final RBMP, outlining how the NAP and the RBMP will meet this 50% Nitrogen reduction target.
		The Forum recommends that an independent review of the final NAP is carried out to assess how capable this tool will be for meeting WFD water quality objectives.

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		The Forum recommends that the mitigation measure to establish 2500km of riverside interception measures is included as an additional Principal Action in the final RBMP, along with details as to how it will be implemented.
		In relation to interception measures, the Forum recommends that greater consideration be given to requiring spatially targeted extended buffer zones, particularly in poorly draining areas which enable interception of runoff and therefore pollutants.
		The Irish Government should supplement CAP payments to ensure sufficient coverage of spatially targeted buffer zones to ensure sufficient coverage in critical source areas; these should be considered as a cost-effective policy tool of the RBMP for achieving WFD objectives.
		An Action should be added to the Plan for the Department, with support from the EPA and LAWPRO, to develop a targeted farm compliance assurance regime for DAFM and local authorities that is based on characterisation of the catchment areas of relevant water bodies prior to choosing the farms for inspection and the farm visit.
		An action should be added to the RBMP to develop mandatory training in catchment management and targeting farm inspections to strengthen the inspection regime and align it with the WFD requirements.
		Targeted inspections should lead to targeted mitigation measures, and the communication of mitigation measures between Local Authority staff and/or advisors to the farmers, should highlight the range of co-benefits that various measures will have for water, climate and biodiversity.
		DHLGH and DAFM should allocate sufficient resources to support the training requirements for both farmers and contractors to support the implementation of the RBMP measures to meet WFD requirements.
		An action should be added to the final RBMP to do an independent review of the final CAP to assess its strengths and weaknesses to meet the WFD objectives. Where weaknesses are highlighted, the Department should outline how it will supplement the CAP to protect and restore water bodies.
		The work of farm advisors should be expanded to include all deteriorating and At Risk water bodies, and an Action should added to the final RBMP to address the need for knowledge-transfer between ASSAP advisors and other farm advisors in order to mainstream the work of ASSAP to include all deteriorating or At Risk water bodies.
		The Forum supports the need to expand ASSAP but recommends ASSAP expands in parallel with increased catchment scientists, to ensure the ASSAP team have the necessary catchment characterisation understanding and evidence to develop effective farm actions.
		The Forum emphasises the need for close cooperation and collaboration between LAWPRO and ASSAP, where both agencies are working in a fully integrated manner to achieve water quality objectives.
		Hydromorphology

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		The Water Forum recommends that the necessary legislation for the Controlled Activities for the Protection of Water regime (legislation, regulation, administration and communications) is put in place as soon as possible following significant consultation with all stakeholders.
		The Arterial Drainage Act 1945 needs to be reviewed to assess its alignment with the objectives of the WFD, while opportunities for the implementation of alternative nature-based catchment management options for flood risk management should be considered.
		The Planning Guidelines proposed in the 2nd cycle need to be urgently implemented, where WFD-specific assessments (similar to EIA) should be carried out in advance of all developments impacting water bodies, e.g. dredging, drainage, river maintenance, flood protection. Training should also be provided to all planners and works contractors on the requirements.
		The development of a national framework and guidance for river restoration that includes nature-based catchment management solutions (NWRM) as recommended by the NWRM working group needs to be included in the plan.
		The Forum recommends that a proposed measure is added to the RBMP for the delivery of an awareness campaign to provide guidance to land-owners on land management practice.
		Forestry
		The Forum recommends that the 2022-2027 RBMP contain a summary of the status of water bodies outlined in the second RBMP (238 at risk from forestry and 51 with high status objectives), comparing their quality and status at the commencement and end of the second cycle. This will provide clarity as to the relative success of the measures for the 2018-2021 period and will serve as a useful benchmark from which to plan measures for the forestry sector at national, sub-catchment and water body level for the 2022-2027 Plan.
		The Forum recommends that for the 233 water bodies where forestry has been identified as the significant pressure, that targeted measures (either restore / protect measures) are included to indicate how the RBMP will reduce the forestry pressure from these water bodies. Timelines should also be included, both interim timelines to indicate progress during the 3rd cycle, and the date expected for each water body to achieve its WFD objective.
		The Forum recommends that details of the relevant forestry policies and projects should be included in the final RBMP (similar to the format of the second RBMP), particularly those which will impact or support the required implementation measures in the final plan.
		The Forum recommends that details are added to the final RBMP on how the new Forest Strategy and the next Forestry Programme will align with the requirements of the WFD. Furthermore, the Forum recommends that as part of this process the Forestry Service outline how much land is available for different types of afforestation

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		(i.e. the right places). – These sensitivity maps would be a proactive measure for the protection of water from future afforestation activities.
		The Forum recommends that the RBMP should provide detail on proposed engagement between the DAFM and other parties on forestry-related issues, as to what these engagements are expected to achieve, increasing transparency and accountability for aligning forestry activities with the WFD. Furthermore, a table should be added to the RBMP outlining the roles and responsibilities of the different Government departments, state bodies and agencies to ensure transparency and accountability in the third cycle.
		The Forum recommends that the RBMP provides more direction for DAFM to ensure that their licence application process is aligned with the WFD. In particular, there should be specific WFD site assessments for licencing of all afforestation activities, including new planting, harvesting and on-going management and any other related activities that could have an impact on water quality. Catchment-scale, accumulative impacts of forestry should be included in these assessments.
		The Forum recommends that all new afforestation on lands not previously used for this purpose be carried out according to the principle of the right trees in the right places for the right reasons and with the right management and in accordance with objectives of the WFD.
		The Forum recommends that specific mandatory training on EPA PIP maps and associated characterisation and assessment science should be delivered by the EPA to all inspectors, to support the Forestry GIS based system that is used for licence applications.
		The Forum recommends that the RBMP includes an action for DAFM to implement the policy recommendations presented in the HYDROFOR report for the protection of the ecological quality of water. Where there are exceptional circumstances where DAFM cannot implement some of the recommendations, the Forum recommends that DAFM develop a summary report outlining the supporting justification as to why. This would ensure transparency and accountability in the decision-making process, along with challenges, for adopting the significant policy recommendations arising from an assessment of the impacts of forestry operations on the ecological quality of water.
		The Forum is of the view that the draft RBMP lacks targeted measures to deal with the legacy forestry issues and their impacts on water quality and recommends that DAFM, with support of the DHLGH, outline key actions to tackle this issue at a national level and also at sub-catchment and water body level.
		The Forum recommends that an action is added to the RBMP to incorporate learnings from the Waters of LIFE pilot projects (on an on-going basis) to tackle legacy forestry issues where they are impacting on high status waters.
		The Forum recommends that the engagement between the Forestry Service and LAWPRO is expanded to ensure that all water bodies ‘at risk’ from forestry are being addressed. This should also include the identification of protection measures for high-status water bodies.

Submission Seq. No	Consultee	Requests
		The Forum recommends that the Forestry Section (DAFM) and the Water Advisory Section (DHLGH) should have input in the delivery of the tree planting activities of the new CAP to ensure maximum outputs for water quality.
		High Status Objective Water Bodies
		The Forum recommends that a section is added to the RBMP to outline the strategy to protect high status sites, with an associated list of principal actions and clarity about governance, accountability and implementation. A table should be added to this section outlining the roles and responsibilities of the different Government departments, state bodies and agencies. An integrated catchment management approach must be adopted, ensuring coherence across governance bodies and policies.
		The Forum recommends that an urgent action is added to the RBMP to develop a plan to urgently protect the 230 high status water bodies. Furthermore, the 20 remaining pristine water bodies should be included as a sub-group within this plan, with an emphasis on high-level protection of the water bodies. The active measures required to protect or restore all of the 384 water bodies with high status objectives must also be outlined in the final RBMP.
		The Forum recommends that an action is added to the RBMP on the monitoring and reviewing of the Blue Dot Programme, including details of the role of the Blue Dot Steering Committee.
		The Forum recommends that details of the Waters of LIFE project, its objectives and associated collaborations should be included as a key action in the RBMP to address high-status sites.
		The Forum recommends that a member of the Forum executive should sit on the Waters of LIFE Stakeholder Advisory Group, to allow updates to be provided to the Forum members on the progress of the plan.
		The Forum recommends that the DHLGH engage with the DAFM to ensure priority access to AECM schemes for landowners within all 384 high status objective water bodies (currently approximately 70% are included) as a means to meet WFD objectives.
		The Forum recommends a national awareness campaign on Blue Dot catchments and high-status objective water bodies and why it is essential that their status is restored and protected.
		Urban Wastewater
		The Forum recommends that the RBMP includes an action for Irish Water to address the deficits in treatment in the 208 water bodies at significant risk from urban wastewater treatment, where Irish Water must outline project details and timelines, in line with the Forum's proposed outcomes-based approach (Box 1). Irish Water must outline clear measures in their RC4 Capital Investment Plan to address the 208 water bodies at risk from urban wastewater, which must be addressed during the third RBMP. Furthermore, there should be no deterioration in the other water bodies putting them at risk from urban wastewater.

Submission Seq. No	Consultee	Requests
		The final RBMP should provide specific information on associated dependencies for funding of wastewater infrastructure, including details of the Enhanced Ambition programme, with details of decision-making for proposed sites and timelines to achieving WFD objectives.
		The assessments of all shellfish designated areas should be completed urgently, and that the necessary treatment processes are put in place to protect freshwater pearl mussel habitats and all shellfish designated areas.
		A regulatory framework promoting nature based solutions at the national level should be adopted and harmonised with the recommendations of existing European and International regimes (e.g. Paris Agreement, 2030 Agenda for Sustainable Development, SDGs, Water Framework Directive, Water Europe's Healthy Soils Strategy, UN and IWA's recommendations, etc.)
		There needs to be greater emphasis on nutrient recovery from wastewater treatment systems in the plan to contribute to a circular economy, while reducing pressures of nutrient pollution from wastewater.
		Domestic Wastewater
		In relation to the National Inspection Plan, the EPA should integrate enforcement follow-through as part of its audit of local authorities, along with refresher training to Local Authority Inspectors on the enforcement model, due to large numbers of non-compliant advisory notices outstanding.
		The EPA should lead a targeted Education and Awareness Campaign for the 160,000 dwellings that have a household well and DWWTS co-located on the same site to highlight health and environmental risks to encourage homeowners to correctly maintain their DWWTS.
		An action should be added to the final RBMP for on-going communication between the DHLGH, the EPA and Local Authorities, to ensure the grant scheme is optimal and effective at reducing the risk of DWWTS to water bodies, removing current obstacles for receiving the grant.
		The Forum recommends that the grant scheme should be made available to all homeowners in Zone 1 (i.e. dwellings that are within 100m of water bodies that have been identified as being at risk from DWWTS) as a pro-active measure to reduce the national threat from DWWTS to our water bodies, supporting measures to achieve WFD objectives for at-risk water bodies.
		The Forum raised concern in their submission to the EPA that planning and building control "are outside the scope of the NIP" and believe a more integrated approach including planning and building control would be more effective in addressing Ireland's water quality crises.
		The RBMP should outline measures to outline how it will integrate Local Authority planning application process with the requirements of the WFD.

Submission Seq. No	Consultee	Requests
		The Forum recommends that the RBMP should act as the framework for policy coherence to reduce pressures from DWWTS and outline how it will align and cohere the different policy tools (e.g. grant scheme, planning guidelines).
		The Forum is concerned about the lack of follow up procedures in relation the establishment of DWWTS at new buildings and recommends that there are follow-up inspections by Local Authority staff to ensure the correct DWWTS was used and that it was installed correctly.
		The Forum recommends that the DHLGH should receive interim updates on the research on the application of zero discharge from domestic wastewater, to allow for planning and incorporation into the 3rd cycle.
		The Forum recommends a number of pilot projects to research community based nutrient recovery from domestic wastewater. Learnings from these projects could support the development of guidelines for alternative approaches to domestic wastewater treatment.
		Peatlands
		An assessment of the status of water bodies outlined as being at risk from peatlands in the second RBMP should be carried out to determine if there was any change in status over the second cycle, where learnings should support the development of proposed measures for the third RBMP.
		The Forum recommends the implementation of existing policies to ensure compliance with relevant regulations and the eradication of deficiencies or conflicts across legislations. Urgent action is required to restore the raised and blanket bog as required under the Habitats Directive.
		Peatland degradation status should be fully recognised in the River Basin Management plans and thus monitored carefully in all catchments, especially with regards to dissolved organic carbon and ammonia emissions within each catchment. Measures must be included to reduce the impacts of degraded peatlands.
		A National Strategy for the rewetting of peat soils needs to be developed. Implementation of supports to rewet agricultural peatlands or practice change for rewetting must be easy and monitoring and evaluation must be captured. The Strategy will have to include measures to provide financial supports for farmers to rewet their agricultural peatlands.
		All activities to rewet, restore and manage peatlands needs to be assessed for compliance with the WFD, while also taking account the multiple benefits for climate and biodiversity.
		Invasive Alien Species
		Establish a suitably resourced, single lead Division that is responsible for Invasive Alien Species (IAS) management in Ireland, for example the National Parks and Wildlife Service (NPWS). This single lead division would ensure engagement with and coherence across various Government departments (including DHLGH and DAFM), sectors and agencies.

Submission Seq. No	Consultee	Requests
		An All-Ireland IAS Forum should be established which would report to the responsible agencies for IAS in Ireland and Northern Ireland. It will bring together national and international IAS experts, scientists, policy makers, practitioners, and stakeholders to advise both jurisdictions regarding IAS and biosecurity management on the island of Ireland.
		A National Biosecurity Strategy should be developed that includes biosecurity guidelines and plans based on international best practice to encourage good biosecurity practice such as the need for biosecurity declaration forms at ports and entry points. The lack of biosecurity awareness was evidenced with the issues related to the crayfish plague during the second cycle.
		Provide appropriate resources, training and support in relation to IAS for our national Customs services at ports/entry points throughout Ireland.
		IAS education and awareness programmes should be supported, such as biosecurity campaigns, along with pertinent materials on codes of practice, protocols for use by all stakeholders (garden centres, supermarkets, anglers, water sports industries etc).
		Transitional and Coastal Waters
		The Forum recommends that a table is added to the RBMP outlining the roles and responsibilities of Government departments, state bodies and agencies in the management of transitional and coastal waters, including the roles of Local Authorities, the EPA, the Marine Institute and MARA.
		The Forum recommends that an urgent action is added to the RBMP to address the data gap in the status of transitional and coastal water bodies. The RBMP should outline the measures and associated timelines for collecting the required data in these water bodies.
		The Forum recommends that targeted measures are developed for every transitional and coastal water body to either restore or protect these water bodies, along with estimates of timelines for these water bodies to achieve their WFD objectives. When assessing pressures and significant issues in these water bodies, coastal-specific pressures should also be included (not only pressures upstream of the estuary).
		The Forum recommends that a section is added to the final RBMP outlining the measures required for the integrated and joined up management of the marine environment, including measures to address policy coherence and interdepartmental collaboration. In particular, the RBMP should identify how it will align with the programme of measures of the MSFD.
		Aquaculture
		The Forum is supportive of the second principal action to strengthen the links between the Aquaculture licensing process and the objectives of the WFD; the Forum recommends that the cumulative impact of aquaculture is essential in the aquaculture licencing process, (including the threat to native species, nutrient impact, disease, marine litter, the introduction and spread of non-native invasive species) and there should be

Submission Seq. No	Consultee	Requests
		WFD assessments carried out for every licence to ensure compliance with the WFD. Furthermore, there should be transparency in the application process and environmental assessments.
		The Forum is supportive of the proposed action for "DHLGH will seek to implement a new legislative and management framework for shellfish waters in Ireland." to ensure shellfish waters meet the required water quality standards. The Forum, however, are of the view, that an action should be added to the RBMP to indicate how licenced farms in turn comply with the WFD (through monitoring of water quality for example), thereby protecting their ambient water bodies from pollutants from aquaculture activities, e.g. nutrients.
		The Forum recommends for stronger regulation and enforcement around aquaculture activities, for both new and existing licences, particularly to prevent the spread of sea lice and escapees of farmed salmon.
1012R	Individual	The plan needs to set up a high visibility national "hot line" to report instances of pollution.
		The plan must actively publicise the outcome of such court cases (in local/regional/national media) as a deterrent to others.
		The plan should ensure that sufficient staff are trained in environmental science AND legal practices (for court appearances when prosecution is warranted)
		The plan must adapt a zero-tolerance approach to polluters – prosecute, seeking the highest possible penalties and costs.
		The plan should actively publicise the outcome of such court cases (in local/regional/national media) as a deterrent to others.
1016R	Individual	The plan should investigate the ecological damage that this dam is doing to the Gearagh should be reviewed in the context of the biodiversity crisis should be reversed and the Gearagh restored.
		The plan should identify where Maize should not be grown, a distance of 500m from a river or stream as the plastic covering the crop seals 75% of the surface therefore concentrates rainfall run off into channels and accelerates topsoil loss.
858R	Woodlands of Ireland	The plan should identify pressures on water: Within the Framework for Integrated Land and Landscape Management (2020) recently proposed by An Fóram Uisce, there needs to be identification of and implementation of a Protective/Protection Forest Zone strategy in each catchment: 'further legislation is likely to be needed to (1) enable safeguard zones to be legally designated, where appropriate, (2) provide for strengthened protection measures within these zones and (3) assign legal responsibilities in protecting drinking waters through safeguard zones.
		The plan should have Protective Forest Zones which require active management using Continuous Cover Forestry (CCF) silvicultural systems.

Submission Seq. No	Consultee	Requests
866R	iCatch Network	For the catchment plans to be successful there needs to be meaningful local public participation and not just consultation.
463R	Green Party	If this new plan is to be successful in meeting its objectives, a single lead enforcement agency with the powers to monitor and uphold key performance metrics must be identified. The agency in question must be provided with sufficient resources and staff numbers to meet its objectives fully. Without this, compliance with the measures outlined in the plan will be inconsistent.
		The RBMP should be complemented by a “Biodiversity Net Gain” approach to planning in the areas of our river basins.
		The goals outlined in the draft RBMP in relation to reducing pressures on water quality from nitrates and other agricultural processes are welcome but will require a credible set of incentives and enforcement measures to be successful.
		The RBMP must ensure that a joined-up approach is taken to the preservation of water quality and wastewater management. The Plan should outline how lead agencies will collaborate with Irish Water to ensure that wastewater infrastructure which is overcapacity and has the potential to contribute to water pollution is identified and prioritised for upgrade works.
1027R	Individual	I believe the plan should be more ambitious and target the agricultural sector particularly. Wetland areas should be restored as much as possible, and forests should be retained and expanded to improve flood control and quality control.
		Specific action within the plan must be taken for Irish Water to end sewage pollution, particularly the 12 towns and villages highlighted last year as continuing to pump untreated sewage into our water bodies.
		The plan must make water governance transparent and brought into compliance with the Aarhus Convention. Participation of the public and local river groups in the development of catchment management plans must be facilitated & resourced.
1039R	Individual	The plan should consider the effect of the current Ukraine crisis, as the supply of fertiliser from there is greatly affected. This would be a good time to suggest to farmers to grow naturally or organic….for those who grow grass and fertilise it, planning a mixed sward gives excellent results, no need to apply fertiliser! Reducing the run-off of nitrates into our water systems problem. Cost advantages, but it’s also better for the land, better for biodiversity.
1345R	Individual	The plan should regulate land spread burden and that it must be independently tested on a regular basis, and not let to be "self-regulated".
		The plan should ensure that statutory bodies fulfil their obligation to the community.

Submission Seq. No	Consultee	Requests
1366R	Individual	The plan needs to create an independent River Basin (Rivers Trust) with a permanent Ecologist and Hydrologist employed to professionally monitor the water sources and an advisory Board made up of local community representatives, with regular public reporting via their website of water quality testing and results.
		The plan should ensure that each Local Authority should be obliged to publish locally the results of all monitoring, testing, and contaminations of each river lake etc. each month.
		The plan should ensure that each Local Authority must be empowered to ensure efficient enforcement measures for breaches of water quality, including professional appropriate staff in place to ensure enforcement is dealt with urgently.
		The plan should ensure that each Local Authority must be made accountable for their role in improving water quality in their areas. Sligo County Council is presently planning to construct a bridge over the Garavogue River based on an Environmental Impact Statement that was prepared 15 years ago. Such disregard for environmental legislation should not be tolerated by the Government.
		The plan should implement penalties for breaching of standards in place with appropriate legal regulations to ensure compliance.
		The RBMP should encourage education and engagement of the farming community to allow them to play their part in ensuring the activities of farming is not a pollutant. Significant fines should be imposed where improvements are not made. No other industry would be allowed to continue pollute our waters in the way the farming industry is allowed to pollute.
		The plan should implement a scheme to require farmers set aside area at verge of rivers etc. with compensation, to improve the quality of our waters.
		The plan must ensure that monitoring schedules of our rivers and lakes are to be published so local communities can visibly see it in action and have confidence in the process. A yearly sampling test is not sufficient to give confidence to people.
1371R	Individual	The plan should ensure that with the arrival of a new RBMP, every department/agency should be required to carry out a thorough internal review to ensure that it is fully fit for purpose in respect of its role under the RBMP. It should be a requirement that proof of this is provided to the appropriate management body (cf No. 1 above).
1383R	Individual	The plan must ensure that the agriculture policy is be brought in line with the Water Framework Directive (WFD) to arrest current levels of pollution through a WFD-specific risk assessment for all intensive farms, including derogation farms, as part of a permitting system.
104R	Individual	The plan should consider that the "slan" is no longer in use in most cases, machinery operators should be educated not to cut turf banks into streams and loughs but instead to allow a buffer zone of at least 10m so that silt will be stopped from entering watercourses. Existing direct flows should be blocked.

Submission Seq. No	Consultee	Requests
		The plan should consider having turf cutters obtain a licence where cutting is taking place close to a waterbody. EPA staff should visit bogs during the springtime to monitor the turf cutting operations near waterbodies.
1374R	MacGillycuddy Reeks European Innovation Partnership Project	The plan should propose targeted training which is it be delivered to Project staff and Farm Advisors on the main factors affecting water quality in the proposed Cooperative regions and the types of actions which can be implemented to address these factors in order to maintain and improve water quality.
		The plan should ensure that training should also be delivered to local farmers to raise awareness on the interactions between land management practices and water quality, to highlight potential impacts and to promote sustainable land management practices.
		The plan should have a collaborative approach between LAWPRO, and the Cooperation Projects proposed under the CAP Strategic Plan would provide support for farmers, with efficient use of resources and allow for more effective targeted actions to be completed.
073R	Dublin Airport Authority	Annex 1 of the DMaP presents interim targets, measures and performance criteria for each waterbody surrounding the airport. It is envisaged that the targets, measures and performance criteria presented in the DMaP would be linked to programmes of measures for the waterbodies surrounding the airport in the Third Cycle RBMP.
		DAA would propose to continue collaborative working relationships through an inter-agency Technical Working Group.
155R	Individual	The plan must should make the issue of municipal waste and domestic septic tanks need to be addressed as a priority
204R	Individual	The plan should create a system to show how to audit nitrates derogations.
		The plan should propose that audits for slurry spreading does not occur in prohibited times over winter
		Proposed Solution 1) applicant for single farm payment consents to routine inspections of the state 2) notify dept online of slurry spreading, land parcel and volume 3) notify dept within 48hrs anaerobic digestate or the volume and land parcel 4) a max 50m3 per hectare to be spread per annum
1385R	Bord na Móna	Based on the EPA's most recent reports, peat extraction and drainage are impacting on 106 water bodies across the country, with peat the single pressure on 28 of these water bodies. However, compared to the data in the second-cycle plan, the number of water bodies impacted by peat has decreased and this should be recognised by the current plan.

Submission Seq. No	Consultee	Requests
305R	Individual	The plan should specify that all wind turbines should be setback 300 meters from rivers ,streams, lakes & canals
		The plan should ensure that ground mounted PV developments should not be permitted in the catchment area of an SAC
875R	Inland Fisheries Ireland	***Plan Ambition***
		All life under water should be prioritised in the plan as per WFD requirements.
		Catchment Management Plans
		It is essential that an integrated catchment management approach is followed as a key component of RBMP implementation and associated critical action.
		Measures to Improve Water Quality
		Sustainable drainage systems or similar passive treatment systems should be mandatory in any new urban or road developments and retrofitting considered where possible.
		It is important that all mining activities must also comply with Departmental guidelines for mineral exploration, including the Guidelines for Good Environmental Practice in Mineral Exploration and the Guidance on Discharge to Surface and Groundwater.
		It should be clearly established whether the information related to the increase in waterbodies impacted by agriculture is a reflection of an enhanced data or an actual change in status.
		In Appendix 2, further information is required in relation to #45 – DHLGH to establish a restoration programme. – this programme should not be limited to just construction as other areas have also has an impact in or near waterbodies.
		The assimilative capacity of receiving waters should be used as baselines when calculating target parameter limits and loadings for discharges from industrial works, mines and quarries.
		There is no inventory available of outfalls from roads and other hard surfaces into surface waters. An audit of these outfalls should be undertaken, as well as an assessment of their contribution to pollution.
		Reference should be made to the Inland Fisheries Ireland document Planning for Watercourses in the Urban Environment for further information. DHLGH's Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas also provides guidance.
		Figure 10 – the question arises, does the percentage of waterbodies differ based on what BQE's are monitored - it would be useful to state what each BQE or other element is based on in this graphic.
		Economic analysis must factor in the real costs of environmental damage to water quality and habitat.
		Public Awareness

Submission Seq. No	Consultee	Requests
		It is recommended that more targeted campaigns and events to encourage participation from water users e.g., angling/rowing clubs, the tourism sector and groups such as farmers, local industry etc.
		Public awareness of grants available for upgrading domestic wastewater treatment systems and 'local advisers' to help the public through the process.
		The EPA application “See it? Say it!” and the National Environmental Complaints hotline could be advertised more extensively and regularly.
		Drinking Water Protection
		There is no reference to antibiotics and their impact on Ireland’s water and efforts to control or contain their impact in the draft RBMP – it is important to highlight any progress in this area.
		Discharges from drinking water treatment plants are regarded as an environmental risk by IFI and should be regulated, monitored and licenced.
		Wastewater Management
		Irish Water should introduce a programme of works to install Event Duration Monitors (EDMs) on all storm water overflows.
		Extended producer responsibility schemes should be introduced for microplastic sources such as from the laundering of synthetic textiles and road-tyre abrasion to prevent their introduction into the natural environment.
		Hazardous Substances
		The RBMP must address the threat that emerging pollutants such as ‘forever chemicals’ pose to biodiversity and water quality in rivers. and the precautionary principle should be applied when assessing potential contamination.
		It is recommended that the effectiveness of DAFM Guidelines relating to the filling/use and washing out of sprayers guidelines are reviewed with associated revision where necessary.
		Forestry
		There should be a commitment to address the issue of lack of buffer zones along watercourses due to self-seeding of Sitka Spruce on legacy sites.
		The RBMP must tackle water quality issues linked to forestry “legacy sites” which are unsuitable for afforestation in the Land Types for Afforestation Working Document 2016, incl. most commercial forestry established prior to ‘Forest Service Guidelines’.
		A commitment to address the long-term and recurring water quality issues that will arise from the continuation of commercial forestry operations on cutover peatlands would be useful in the RBMP.
		Peat

Submission Seq. No	Consultee	Requests
		There should be an action included in the Plan which recognises the hydromorphological damage to surface waters incurred in facilitation of commercial peat harvesting and a commitment to habitat restoration of these waters.
		Aquaculture and Fisheries
		It is recommended that the farming of Atlantic salmon in the sea is moved on shore to recirculatory facilities where outputs and pathogens can be appropriately controlled.
		A number of site and issue-specific initiatives should be developed via the Regional Operational Committee network with a focus on maximising the potential co-benefits associated with achieving WFD objectives and improving conditions for fish (such as prioritised instream barrier removal at specific location under action category 5.4.2).
		An action that commits to addressing the sustainability of all finfish aquaculture sites in freshwaters is required.
		The legislation designed to protect the passage of migratory fish largely focuses on the upstream migration of large adult salmon. It is outdated and not fit-for-purpose as it largely relates to an era dominated by small water powered millwheels which were generally operational throughout
		In addition to salmon, the upstream and downstream passage of other migratory fish species such as River Lamprey, Sea Lamprey, Sea Trout, Twaite Shad, Allis Shad, and European Eel needs to be fully considered. Migratory runs of species residing within freshwater such as Brown Trout and Brook Lamprey also need to be considered.
		The impact of Hydro Electric Power (HEP) generation be included as a separate pressure. IFI request the inclusion of an action committing to address the impact of HEP upon fish migration.
		Nutrient Sensitive Areas
		Nutrient budgets should be calculated for each catchment and new agricultural units should not be granted planning permission in catchments where the nutrient budget will be exceeded. Appropriate penalisation according to 'polluter pays' principle and enhanced capacity for regulatory authorities to enforce relevant environmental legislation.
		Invasive Alien Species
		The development of a more coherent and co-ordinated national approach to IAS management is required that will facilitate better communication and collaboration between relevant authorities.
		The introduction of non-native fish and other species should be explicitly prohibited in attenuation ponds, water bodies linked to sand pits and quarries, ornamental ponds etc.
		Further investigation of the extent of relevant sites where raw waters are transferred between/within catchments and also long-term mitigation measures against possible future introductions at such locations is recommended.

Submission Seq. No	Consultee	Requests
		Protected Areas (and water dependent habitats)
		The minimum standards or conditions required to support all fish species could be further described or elaborated in WFD context here -some species may require high WFD status to ensure continued survival (e.g., sensitive salmonid species or the Arctic char which has lost approximately 32% of historical populations with only 44 surviving nationally).
		Artificial and heavily modified water bodies
		It is understood that 'required standards' are those relating to Good Ecological Status, however a comprehensive and clear definition of 'Good Ecological Potential' and the process by which this will be classified in the Irish context is necessary to usefully comment further on the possible expansion of the list of waterbodies designated as 'heavily modified' as referenced.
		Impacts of climate change
		Many measures are not based on the most up to date scientific data.
		Implementation of Second Cycle Plan
		Extensive WFD monitoring is ongoing, but delays in reporting may result in little or no action to remediate certain sites in a timely way. It important that monitoring data are released at least annually and ideally as close to the time of collection as possible.
		Implementation / Governance
		There needs to be recognition of IFI's and other agencies roles in restoration and protection programmes (Figure 18). Figure 18 could be enhanced as a 'process' diagram.
		Areas for action and Appendix 3
		An action plan or similar formal mechanism may be useful when addressing serial pollution issues in some problematical locations.
		Hydromorphology
		Approximately half of the waterbodies where hydromorphology is a significant pressure are within or associated with OPW drainage schemes and therefore, land drainage should be listed as a significant pressure.
		Section 5.4.2 largely refers to a great extent upon barriers, with limited reference to issues such as realignment/straightening, deepening, and widening of channels.
		Extensive lengths of channel characterised by significant hydromorphological degradation have not been included.
		Reference is made to restoration targets (page 62) and water dependent habitats and species listed in the Nature Directives. It is essential that common water dependent species that are not listed in the 'Natura'

Submission Seq. No	Consultee	Requests
		Directives are also recognised here, i.e. “Life Under Water”; for example many fish species have some level of protection in the Fisheries Acts and various Bye-laws but are not listed in the nature Directives, but restoration programmes are still required for many.
		Land use Planning
		A review of penalties for construction malpractices related to the water environment is required along with periodic audits of catchment-wide nutrient flows.
		Planning authorities should not approve any housing, industrial, commercial, or agricultural development unless the development meets tight guidelines in relation to nutrient neutrality.
886R	Kerry Co. Council	A need for an increase in appropriate resources for the development of multi-disciplinary water quality management teams, the implementation of the Good Agricultural Practice Regulations, hydrometric network management, assessment of unknown pressures in water bodies, out of season bathing water management, management and regulation of hydromorphology, aquaculture management, land use planning, and water quality monitoring.
		Consideration of closer integration of synergies and co-benefits arising in the areas of water quality management and climate change/action,
		There is a need to review the system for land reclamation/improvement works to ensure that it is fit for purpose.
		There is a need for the provision of new and upgraded wastewater infrastructure in the county and the expansion of the Domestic Wastewater grant scheme.
		Clarity of the roles and responsibilities for the management and control of IAS, coastal zone management, and drinking water source protection.
869R	OPW	The OPW would welcome further discussion and engagement on the template and preparation of the proposed local catchment management plans to ensure a coordinated approach and the achievement of multiple benefits.
		Localised action for the implementation of Nature-based solutions should be considered by the multi-agency group on Nature-based solutions for catchment management, noting the intended increase in the level of funding under the Community Water Development Fund and the potential to leverage other funding sources for multi-sectoral initiatives.
		Further engagement on Hydromorphology initiatives and the role of the OPW, their resources and capacities, and provide input to the proposed legislative steering group.
		Further engagement on PAA’s initiatives and the role of the OPW, accounting for drainage maintenance obligations, resources and capacities, and the potential benefits of coordination.

Appendix A Department Questionnaire and Response Detail

HOLDER FOR FULL QUESTIONNAIRE

An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

Public consultation on the draft River Basin Management Plan for Ireland 2022-2027

Consultation Response Template

Note:
The purpose of this document is to help both the consultation response and evaluation process. The information provided by respondents will be used in order to shape the content and focus of the final River Basin Management Plan for the period 2022 - 2027.

Respondents are asked to follow the response template. However, it is not necessary to provide responses to all the questions. Respondents are also invited to supplement their responses with any relevant information, reports and/or analysis.

The public consultation process will run until 31 March 2022. Please provide your feedback as a word document (not PDF) by email to rbmp@housing.gov.ie by close of business on that date. Alternatively, you can send in your submission through the Department website (www.gov.ie/draftRBMP) where you can find the link to an online Survey.

Receipt of submissions will be acknowledged but it will not be possible to issue individual responses.

Appendix B Template Submission Format

HOLDER FOR PDF

Email Text

To: rbmp@housing.gov.ie

Subject: RBMP Consultation

Text for body of email:

Dear Sir/Madam,

I am very concerned that half our rivers, lakes and estuaries are unhealthy, with river pollution increasing. I do not believe the proposed River Basin Management Plan will fix this; I submit the following recommendations:

1. The plan must be far more ambitious and include targeted measures to restore ALL waters to healthy status by 2027 and halt deterioration.

2. Agriculture policy must be brought in line with the Water Framework Directive (WFD) to halt escalating pollution through a WFD-specific risk assessment for all intensive farms, including derogation farms, as part of a permitting system.

3. Prohibit wetland drainage and implement a national wetland restoration plan.

4. The Irish Water Investment Plan must end sewage pollution from all the wastewater treatment plants identified as the main pollution source in over 200 waterbodies.

5. Afforestation and felling licenses must include a WFD-specific assessment, with site-specific conditions to protect water. Afforestation on peat soils in acid sensitive catchments must stop.

6. The Plan cannot ignore the coast. It must set out all coastal-specific pressures and the measures to address them.

7. Water governance must be made transparent and brought into compliance with the Aarhus Convention. Participation of the public and local river groups in the development of catchment management plans must be facilitated & resourced.

Kind regards,