

**south  
western**  
river basin district



*Water Matters – Help us Plan!*  
**Digest of submissions and responses to the Draft River  
basin Management Plan for the South Western River  
Basin District**

**South Western River Basin District**

**In accordance with Article 14 of the European Communities (Water Policy)  
Regulations 2003 (S.I. No 722 2003)**

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# 1. Introduction

Draft River Basin Management Plan for the South Western River Basin District (SWRBD) was published on the 22 December 2008, and was subject to public consultation for six months until June 22 2009. This report summarises submissions made on the draft plan during that period and identifies responses made to the submissions by the plan making authorities.

## 1.1. Background

The EU Water Framework Directive (WFD) was adopted in 2000 (2000/60/EC) and was transposed into Irish law by the European Communities (Water Policy) Regulations 2003 (S.I. 722 of 2003 as amended). It establishes a framework for community action in the field of water policy. The WFD requires that Member States manage their waters on the basis of River Basin Districts (RBDs). The directive requires the preparation of a management plan for all of the waters in these RBDs. Some 400 river basins on the island of Ireland have been grouped and assigned to a total of eight RBDs; one of these lies wholly in Northern Ireland, four lie wholly in Ireland and three are International River Basin Districts because their catchments lie partly in Ireland and partly in Northern Ireland. The South Western River Basin District, which is the subject of this report, is located wholly within the Republic of Ireland encompassing all of county Cork and parts of counties Kerry and Waterford.

The primary objective of the WFD is to maintain the “high or good status” of waters where it exists, prevent deterioration in existing status of waters, reduce chemical pollution and to achieve at least “good status” in relation to all waters by 2015. The mechanism by which this is to be achieved under the WFD is through the adoption and implementation of River Basin Management Plans (RBMPs) and Programme of Measures (POMs) for each of the RBDs.

In Ireland the EPA is responsible for establishing the status of all waters through monitoring and application of new ecological and chemical classification systems. The Local Authorities, working jointly within the RBDs, are responsible for setting objectives, and designing and implementing a programme of measures in order to achieve those objectives at a waterbody level. Measures comprise the full implementation of existing EU Directives and new statutory controls and, where it is determined that the statutory measures will not achieve the objectives of the Directive additional measures are implemented at a local level.

The River Basin Management Plans and associated Programmes of Measure provide a framework for sustainable management of the water environment and set out how the environmental objectives of the WFD are to be met. The RBMPs and POMs are subject to Strategic Environmental Assessment (SEA) and all subsequent review of the RBMPs and POMs, as committed to under the WFD, are also subject to SEA.

Article 14 of the WFD requires Member States to encourage active public involvement in the development of river basin management plans. A summary of consultations on the draft RBMP, any inputs from the SEA process, and updates arising, will be included in the final RBMPs.

**Table 1 Implementation Timeline of the Water Framework Directive**

<b>Year</b>	<b>Requirement</b>
<b>2000</b>	Directive entered into force (Article 22)
<b>2003</b>	Transpose Directive into domestic law (Article 24).
	River Basin Districts (RBDs) and International River Basin Districts (IRBDs) identified and the competent authorities that will be empowered to implement the Directive, appointed (Article 3).
<b>2004</b>	Complete an analysis of characteristics and a review of the impact of human activity on status (CHARACTERISATION) on RBDs and IRBDs (Article 5).
	Complete first ECONOMIC ANALYSIS of water use.
	Establish a register or REGISTERS OF PROTECTED AREAS in each River Basin District (Articles 6&7)
<b>2005</b>	Establish criteria for the assessment of good groundwater chemical status and criteria for identifying significant upward trends (Article 17)
<b>2006</b>	Set up environmental monitoring programmes to ensure comprehensive view of water quality status within each RBD (Article 8).
	Publish, for consultation, a work programme for producing the first RBMPs (Article 14).
	Establish environmental quality standards for priority substances and controls on principal sources (Article 16)
<b>2007</b>	Publish, for consultation, an interim overview of the significant water management issues in each RBD and IRBD (Article 14).
<b>2008</b>	Publish full draft RBMPs for consultation (Article 14).
<b>2009</b>	Finalise and publish first RBMPs (Article 13).
	Finalise PROGRAMME OF MEASURES to meet objectives (Article 11).
<b>2010</b>	Introduce pricing policies (Article 9).
<b>2012</b>	Ensure PROGRAMME OF MEASURES operational (Article 11).
	Publish timetable and work programme for second RBMPs.
	Report progress in implementing measures (Article 15)
<b>2013</b>	Review, for the first RBMP;
	Characterisation and impact assessments
	Economic analysis of water use
	Publish, for consultation, an interim overview of the significant water management issues for second RBMP.
<b>2014</b>	Publish second draft RBMPs for consultation.
<b>2015</b>	Achieve environmental objectives set out in first RBMPs i.e. 'GOOD STATUS' achieved (Article 4).
	Finalise and publish second RBMP with revised Programme of Measures (Articles 13,14 &15).

## 1.2. Consultation and Participation Activities

Draft RBMPs for the SWRBD were published on the 22<sup>nd</sup> December 2008, and consultation on the draft plans took place from 22<sup>nd</sup> December 2008 to 22<sup>nd</sup> June 2009. Stakeholders and the public were invited to submit comments in relation to the draft plans through notices placed in national and local newspapers, through national and local radio, and through a number of river basin district, local authority and agency websites.

As part of the consultation process a series of public information events were held in the South Western River Basin District. These events took place between 28<sup>th</sup> April 2009 and 12<sup>th</sup> May 2009. Venues and dates at which they took place are listed below.

**Table 2 Public Consultation Meetings**

<b>Date</b>	<b>Location</b>	<b>Venue</b>
Tuesday 28th April	Cork	Foyer, County Hall, Co. Cork
Tuesday 5th May	Waterford	Foyer, Waterford County Council, Civic Offices, Davitts Quay, Dungarvan, Co. Waterford.
Thursday 7th May	Cork	Mallow GAA Sports Complex, St Joseph's Rd, Carrigoon, Mallow, Co Cork
Monday 11th May	Cork	Council Chambers, Town Council Offices, North Street, Skibbereen, Co. Cork
Tuesday 12th May	Kerry	Killarney Library, Rock Road, Killarney, Co. Kerry

The information events gave the public and stakeholder groups an opportunity to meet with the project team, collect information on the South Western RBD, be introduced to the use of the web based RBMP map viewer ('WaterMatters'), and give their views and comments on the draft plans and associated Strategic Environmental Assessment and Habitats Directive Assessment. Comment was also facilitated through completion of questionnaires available in hard copy on the day and also available through the SWRBD website.

## 1.3. Scope of the digest

This digest is a compilation of written submissions received during the consultation period, including completed questionnaires and comments made at public meetings plus any submissions made subsequent to the meetings up until 22<sup>nd</sup> June 2009. Responses have been made to submissions, and all are being considered during the development of the final South Western River Basin Management Plan. This digest of submissions and responses is being distributed to those who took part in the process and other interested parties, and will also be available at [www.swrbd.ie](http://www.swrbd.ie) and [www.wfdireland.ie](http://www.wfdireland.ie).

## 2. Summary of submissions

### 2.1. Submissions

A total of 44 submissions were received for the South Western River Basin District, including written submissions, comments and questionnaires. Table 3 lists the organisations / persons that made submissions during the consultation process.

### 2.2. Topics covered

Issues that arose in written submissions, questionnaires and comments were abstracted and were collated as follows:

- Issues related to key national topics:
  - Wastewater and industrial discharges
  - Landfills, quarries, mines and contaminated lands
  - Agriculture
  - Wastewater from unsewered properties
  - Forestry
  - Usage and discharge of dangerous substances
  - Physical modifications
  - Abstractions
- Locally focused and future issues including:
  - Aquaculture
  - Invasive Alien Species
  - Protecting High Quality Areas
  - Climate Change
  - Shared Water issues.
- Other issues:
  - Cruising, Boating & recreation
  - Public Participation
  - Economics
  - Implementation
  - Measures
  - Extended Deadlines
  - Integration with other Plans
  - Website/Watermaps
  - Waterbody Specific Issues and
  - Editorial amendments.

### 3. Issues Raised and Responses

#### 3.1. Referencing system

Reference codes have been assigned to the organisations and individuals that made submissions (see Table 3 below).

**Table 3 Organisations and Reference Codes for submissions**

Reference No.	Organisation	Submission Number	RBD
110	DAFF	SW_RBMP_01	SWRBD
111	Birdwatch Ireland	SW_RBMP_02	SWRBD
112	DoEHLG	SW_RBMP_03	SWRBD
113	IFA	SW_RBMP_04	SWRBD
114	Mills and Millers of Ireland	SW_RBMP_05	SWRBD
115	Southern Regional Fisheries Board	SW_RBMP_06	SWRBD
116	South Tipperary County Council	SW_RBMP_07	SWRBD
117	Port of Cork	SW_RBMP_08	SWRBD
118	Teagasc	SW_RBMP_09	SWRBD
119	ESB	SW_RBMP_10	SWRBD
120	Lough Leane Working Group	SW_RBMP_11	SWRBD
121	Killarney Nature Conservation group	SW_RBMP_12	SWRBD
122	Kerry Co Co	SW_RBMP_13	SWRBD
123	Watergrasshill Community Association	SW_RBMP_14	SWRBD
124	Member of the Public (Lisbeth Kelly)	SW_RBMP_15	SWRBD
125	Animal & Plant Health Association Ltd	SW_RBMP_16	SWRBD
126	Cork County Council	SW_RBMP_17	SWRBD
127	Kerry Anglers' Federation	SW_RBMP_18	SWRBD
128	Heritage Council	SW_RBMP_19	SWRBD
129	Industrial Heritage Association	SW_RBMP_20	SWRBD
130	South Western Regional Fisheries Board	SW_RBMP_21	SWRBD
131	Member of the Public (Mary Shanahan)	SW_RBMP_22	SWRBD
132	Coillte	SW_RBMP_23	SWRBD
133	EPA	SW_RBMP_24	SWRBD
134	Central Fisheries Board	SW_RBMP_25	SWRBD
135	Irish Concrete Federation	SW_RBMP_26	SWRBD
136	ICMSA	SW_RBMP_27	SWRBD
137	Waterford IFA Chairman	SW_RBMP_28	SWRBD
138	Irish Wildlife Trust	SW_RBMP_29	SWRBD
139	Independent Farmers' Federation	SW_RBMP_30	SWRBD
140	Failte Ireland	SW_RBMP_31	SWRBD
141	Waterford Co Co	SW_RBMP_32	SWRBD
142	An Taisce	SW_RBMP_33	SWRBD

Reference No.	Organisation	Submission Number	RBD
143	Dept. Communications, Energy & Natural Resources	SW_RBMP_34	SWRBD
144	Cork Environmental Forum	SW_RBMP_35	SWRBD
145	Coillte Laboratories Research and Environment	SW_RBMP_36	SWRBD
146	GSI	SW_RBMP_37	SWRBD
147	SWAN	SW_RBMP_38	SWRBD
148	Shay Murtagh Ltd	SW_RBMP_39	SWRBD
149	OPW	SW_RBMP_40	SWRBD
150	EPA	SW_RBMP_41	SWRBD
312	Member of the Public (Natasha Harty)	SW_RBMP_042	SWRBD
313	IFA	SW_RBMP_043	SWRBD
314	Waterways Ireland	SW_RBMP_044	SWRBD

### 3.2. Summary Table of Public Consultation Key Submissions and Responses

Table 4 briefly summarises the broad categories of comment received and outlines the general nature of the response.

**Table 4 Summary of Public Participation Key Submissions and Responses**

Comment Category	Response
<b>Comments on additional measures:</b> Some supplementary measures were suggested to deal with key issues for example water conservation, reedbeds or constructed wetlands.	<b>Response:</b> these measures either already were or have since been screened under the Strategic Environmental Assessment as reduction, remediation or relocation options forming part of the suite of plan measures.
<b>Comments reflecting differing views:</b> There were differing views regarding some topics, for example agricultural sectoral representatives stated that possible supplementary measures should not be included whilst environmental groups commented that it was not adequate to await agricultural catchment study findings before selecting from such measures. A similar range of views were expressed regarding forestry measures along with suggestions regarding their wording.	<b>Response:</b> These comments have been considered and the measures updated where appropriate.
<b>Comments on local issues:</b> There were a number of submissions focusing on more localised issues and commenting on, or raising questions about, particular waterbodies or suggesting additional topics.	<b>Response:</b> This digest clarifies the measures in relation to these additional topics such as wind farms, which mainly fall within the existing regulatory system.

<b>Comment Category</b>	<b>Response</b>
<b>Comments on key issues:</b> Submissions also highlighted the need to further clarify some key issues or measures for example regarding aquaculture pressures, climate change or planning controls.	<b>Response:</b> Clarification text and updates on climate change approaches under the Water Framework Directive have been provided in the plan.
<b>Comments on public participation:</b> The public participation issue attracted a good deal of comment with suggestions of inclusion of all parties in the decision making and implementation processes. Additional aspects of water management (for example biodiversity) were suggested for the awareness programme. The level of interest in accessibility of background information and mapping further reinforced the need for ongoing support to public information programmes and tools.	<b>Response:</b> Water Management Unit Action Plans have been developed which bring more focus to where key actions are required on a local (i.e. sub-catchment) basis. Further development of the Water Maps tool has taken place and the education and awareness programme remains part of the suite of measures.
<b>Comments on economics:</b> The economics theme attracted comment regarding the need to set out economic information on selecting measures and extending deadlines but also for the need to consider grant incentives, water pricing and funding of the programme of measures. Water charging was identified as an economic measure in submissions to all districts.	<b>Response:</b> Costing of wastewater and on-site system measures has been undertaken for all water management units. The plan clarifies the recent proposals on water pricing policy and also confirms that economic analysis has not been used to extend deadlines for the plan.
<b>Comments on enforcement:</b> The enforcement issue generated a number of comments about the implementation of the plan and programme of measures. In particular organisation arrangements for river basin district management were highlighted.	<b>Response:</b> Implementation responsibilities and the role of the National Advisory Committee have been updated in the plan.
<b>Comments on clarity of measures:</b> Numerous submissions were made regarding the programme of measures. The submissions were largely supportive of the measures but many organisations found it difficult to identify which measures applied to which waters by when (that is to “quantify” the programme)	<b>Response:</b> Further development of public participation tools, particularly the preparation of Water Management Unit Action Plans, has been undertaken to provide more clarity at this level of detail.
<b>Comments on level of ambition:</b> Numerous submissions were also made regarding the objectives, with the level of ambition of the plan either considered too high or too low depending on the view of the consultees (for	<b>Response:</b> Detailed technical studies have reviewed these issues providing scientific data to determine cases where time extensions in objectives are necessary.

<b>Comment Category</b>	<b>Response</b>
example Local Authority or Non Governmental Organisation). In particular concerns were raised about realistic timeframes for improvements of less than good waters to take place due to physical recovery or practical constraints. The timescales required for waters supporting protected area interests were also highlighted for further consideration in several submissions.	
<b>Comments on integration with other plans:</b> The section about integration of plans and programmes also raised several comments with suggestions of links to additional plans.	<b>Response:</b> Where appropriate these have been added to the register of linked plans and programmes.
<b>Comments on monitoring and classification:</b> There were a significant number of comments about the monitoring data and classification process.	<b>Response:</b> These have been drawn to the attention of the relevant agency (mainly the Environmental Protection Agency or DEHLG - National Parks and Wildlife Service).
<b>Editorial Comments:</b> Editorial comments or corrections were submitted by several parties.	<b>Response:</b> Where appropriate these have been included in the plan.

#### **4. Submissions and Responses on the Draft River Basin Management Plans for the SWRBD**

The digest of written submissions received during the consultation period up until 22<sup>nd</sup> June 2009 relating to the SWRBD draft management plan is provided in the tables hereunder. Responses made to submissions by the appropriate bodies are also included.

#### 4.1. Waste Water and Industrial Discharges

Organisation	Wastewater and Industrial Discharges	RESPONSES
<b>Public</b> <b>SW_RBMP_22</b>	Over development in construction is a threat to our waters	Comment noted. The River Basin Management Plan is to contain measures in relation to the limitation of development in areas where it is identified that there will be insufficient future capacity at treatment plants serving these areas. This measure is to ensure that the capacity of the plant will not be exceeded in the future.
	Pollution is a treat to our waters - fluoride	The European Communities Environmental Objectives (Surface Waters) Regulations, 2009 prescribe environmental quality standards (EQS) for general physico-chemical conditions, specific pollutants, priority substances and priority hazardous substances. An EQS refers to the concentration of a chemical that must not be exceeded in order to support 'good status' water. Fluoride is included as a specific pollutant. Annual Average (AA) EQS are prescribed for Fluoride in inland surface waters and other surface waters. Any discharge to surface waters must not result in the Fluoride concentration (outside of any delineated mixing zone) downstream of the discharge exceeding the relevant AA-EQS. Licence limits must be set to ensure that the relevant EQS is not exceeded. The issue of Fluoride use in drinking water is beyond the remit of the RBMP, however this matter was reviewed recently by the Department of Health and Children.

Organisation	Wastewater and Industrial Discharges	RESPONSES
<b>Central Fisheries Board</b> <b>SW_RBMP_25</b>	There are particular concerns that because of increased urbanization in recent years that the pace of investment in wastewater treatment infrastructure has lagged behind development in particular issues have arisen in relation to the increased frequency of use of storm outfalls. There is a concern that the cumulative impact of discharges from on site wastewater treatment systems facilitated by local authorities is impacting water quality. As many of the local authority sewage outfalls are to water designated SACs, there is a need for stricter ELVs to be applied.	This comment has been noted
<b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b>	Heightened levels of oestrogen and other hormones in wastewater and their impacts on fish and other aquatic fauna is not considered or addressed	This has been looked at by the EPA in the 'Endocrine Disruptors in the Irish Aquatic Environment study which was published in 2006 and is available on the EPA website. The study concluded that Irish rivers and lakes do not appear to be at general risk from significant concentrations of environmental oestrogens.
<b>Independent Farmers' Federation</b> <b>SW_RBMP_30</b>	Request for all local authorities elected members to have the application of all municipal sludge on lands banned. Why has the Food Safety Authority taken so long in having the risk analysis of land spreading of human excrement carried out. Pathogenic micro-organism and heavy metal and chemical contamination of sewage treatment methods needs to be evaluated. DEHLG administrative problems have resulted in delays to the EU Sewage Sludge Directive update and revision.	RBMP requires compliance with all basic measures including the sludge directive. Under this directive land banks used for sludge spreading must be monitored for a range of parameters including heavy metals.
<b>Cork Environmental Forum</b> <b>SW_RBMP_35</b>	<ul style="list-style-type: none"> <li>• Existing waste water treatment plants are incapable of handling present waste loads, let alone of taking the septic tank sludge which would be required if de-sludging of these tanks is required.</li> <li>• Continuous (24/7) monitoring above and below water treatment outfalls is required to assess the impacts of these.</li> <li>• Infrastructure of adequate capacity MUST be in place before new developments are permitted.</li> <li>• Local Authority activities create problems in a variety of ways, including operation of waste water treatment plants (or lack of these), yet they are expected to implement and enforce the WFD requirements. The</li> </ul>	<ul style="list-style-type: none"> <li>• This comment has been noted and forwarded to DEHLG for consideration.</li> <li>• The Urban Waste Water Treatment Regulations, 2001(Article 10 and Schedule 5) prescribe the monitoring requirements at wastewater treatment plants including flow-proportional or time-based 24-hour samples at the outlet. The surface waters Water Framework Directive monitoring programme carried out by the EPA and local authorities specifically includes monitoring points upstream</li> </ul>

Organisation	Wastewater and Industrial Discharges	RESPONSES
	<p>resources available to local authorities to deal with their own problems are inadequate.</p> <ul style="list-style-type: none"> <li>• Heightened levels of oestrogen and other hormones in wastewater (due to contraceptive use) and their impacts on fish and other aquatic fauna is not considered or addressed.</li> <li>• There has been €2bn invested by farmers in waste management systems that will now be paid back over a 3 year period because of lack of funds for the grant system. Farmers are also operating under requirements for restricted fertiliser use as required by the Nitrates Directive. It appears (and informal communications with local authority staff confirm) that local authorities currently target industry and agriculture (and possibly forestry) first in situations of poor water quality as they are easier to locate (information available from government departments), easier to target, and the cost implications of requirements are not borne by the local authority. It is also more complex to locate all septic tanks, assess which are creating pollution and develop systems to address this problem.</li> <li>• The absence of penalties for acts compromising water quality is a problem. In agriculture and industry such penalties do clearly exist. The same is not true in relation to other sources of pressure on water quality.</li> <li>• The local authorities appear to be making efforts to direct the cost implications of plan delivery away from themselves as they have inadequate financial resources. This problem is likely to get worse and not better under present circumstances.</li> </ul>	<p>and downstream of waste water treatment plant outfalls in order to monitor impact.</p> <ul style="list-style-type: none"> <li>• Agreed. One of the s measures included in the Plan is to limit development in an area where it is determined that the capacity of the treatment plant would be exceeded. •Local Authorities recognise the challenge and the necessity of obtaining adequate resources to ensure that existing legislation is enforced. Resources are committed going forward to ensure that the requirements of the Water Framework Directive are implemented.</li> <li>• This has been addressed through EPA study on endocrine disruptors in the Irish Aquatic Environment. Please refer to report below and summary conclusions available on EPA site ENDOCRINE DISRUPTORS IN THE IRISH AQUATIC ENVIRONMENT for any further insight into this matter. There is insufficient information available at present. Technical issues to be addressed before comprehensive measures can be put in place.</li> <li>• It is recognised that unsewered wastewater treatment systems constitute a significant diffuse pressure on water. Local Authorities are aware of issues relating to unsewered systems and they therefore operate strict planning approvals. A study carried out by the Western River Basin District using GIS identifies the waterbodies at risk from septic tanks. Measures proposed for such waterbodies include the inspection of septic tanks, to enforce percolation requirements where inspection dictates and to connect to municipal systems where feasible.</li> </ul>

Organisation	Wastewater and Industrial Discharges	RESPONSES
		<ul style="list-style-type: none"> <li>•The Local Government (Water Pollution) Act, 1977 gives the local authorities powers to take measures in response to water pollution which includes the issuance of notices requiring the polluter to take remedial measures and prosecution. The legal instruments are in place for the control of water pollution from all sources.</li> <li>•Comment noted.</li> </ul>
<b>SWAN</b> <b>SW_RBMP_38</b>	No new development should be permitted unless adequate sewage treatment capacity is in place before permission is granted.	This is already included as a measure
	For new settlements, isolated gated communities and other isolated commercial developments, waste treatment facilities must not be permitted to discharge to watercourses but should be impounded and transported direct to wastewater treatment plants.	This is included as part of the Urban Waste Water Discharge Licensing process (appropriate treatment)
	DEHLG must resource sewage treatment capacity to handle the additional load created by requirements to desludge septic tanks	Comment noted forwarded to DEHLG for consideration.
	The Plan must set out clearly the measure to be taken to tackle heightened hormone levels in water bodies.	This has been addressed through EPA study on endocrine disruptors in the Irish Aquatic Environment. Please refer to report below and summary conclusions available on EPA site ENDOCRINE DISRUPTORS IN THE IRISH AQUATIC ENVIRONMENT for any further insight into this matter. There is insufficient information available at present. Technical issues to be addressed before comprehensive measures can be put in place.
<b>EPA</b> <b>SW_RBMP_41</b>	Prioritised list of UWWTPs for each RBD, that require upgrade or improved operation, to be listed with indication of completion date.	A prioritised list has been developed in support of the plan and reported in a background document.

#### 4.2. Landfills, Quarries, mines and contaminated lands

Organisation	Landfills Quarries Mines and Contaminated land	RESPONSES
<b>SWAN</b> <b>SW_RBMP_38</b>	More detail with regard to addressing pollution from these sites is required. With regard to landfills and contaminated lands, SWAN notes that the Plan is reiterating the proposals for further investigations put forward in 'Water Matters' in 2007. Surely, for some well known problematic sites, e.g. illegal landfills, it time to take action, rather than waiting for results of research.	Action has been progressed via the IPPC licensing system for (contaminated lands) and the Code of Practice (landfills) - these are site specific investigations. Information is available from the relevant authorities, including sites such as illegal landfills where remedial action has already been undertaken.
<b>An Taisce</b> <b>SW_RBMP_33</b>	The threat of contamination from landfill leachate is not accounted for.	This has been included in the risk assessments in the section on landfills within the RBMP.
<b>Watergrasshill Community Association</b> <b>SW_RBMP_14</b>	It is alleged that the aquifer used as a source of a public water supply is being damaged by quarrying operation. It is alleged that the water table has been lowered to facilitate the operation of a quarry. There is also alleged planning issues in relation to quarrying in the area	CDM have undertaken mass balance calculations for the dewatering of a number of sites. The study has demonstrated that in spite of the huge levels of dewatering, a significant negative impact on ground water levels has not been identified. This cycle of the RBMP requires further investigation and monitoring of quarries in order to provide more targeted measures for the next cycle.

### 4.3. Agriculture

Organisation	Agriculture	RESPONSE
<b>Department of Agriculture, Fisheries &amp; Food</b> SW_RBMP_01	The listing of ‘over-grazing remediation’ for consideration as a supplementary measure in respect of agriculture is inappropriate in view of the fact that DAFF has worked closely with the National Parks and Wildlife Service in the preparation and publication of Commonage Framework Plans.	This has been included in measures. Responsibilities have not yet been established.
<b>IFA</b> SW_RBMP_04 <b>Waterford</b>	Draft RBMP has failed to recognise that Ireland adopted a whole territory approach to the Nitrates Regulations. The proposal to introduce ‘possible supplementary measures’ at a later stage ignores this position.	WFD has wider water quality and Protected Area objectives.
<b>IFA</b> SW_RBMP_28	Farmers in the SWRBD, in the last two years have spent over €420 million on nutrient storage, farm buildings and farmyard improvements to comply with the nitrates regulations and the Water Framework Directive	Comment noted - this is already acknowledged in the plan text
	IFA welcomes agreement between Department of Agriculture and the DOE on the DOA Inspectors undertaking the Nitrates Regulations Inspections. Now essential that agreement is communicated and enacted by all County Councils and public bodies	This is an implementation issue and is being considered by the relevant Government Departments.
<b>Mills and Millers of Ireland</b> SW_RBMP_05	Mills are frequently close to situations that are subject to slurry and agricultural contaminations; our members could engage in regular monitoring activity that might benefit both mill owner and the community.	Noted. However it should be noted that the responsibility for monitoring surface and groundwaters in order to establish the extent of pollution in the waters from agricultural sources is assigned to the local authorities and the DAFF under the European Communities (Good Agricultural Practice for Protection of Waters) Regulations 2006.

Organisation	Agriculture	RESPONSE
<b>Teagasc</b> <b>SW_RBMP_09</b>	Concern that 'lag time' between implementation of agri-environmental measures and improvement of water quality, is not sufficiently accounted for, the RBDPMs may prematurely accommodate the implementation of unnecessarily stringent supplementary measure for the agriculture sector.	Work to evaluate the scientific basis for efficacy of measures and lag-time for recovery in water quality will be completed to support extended deadlines for some waterbodies impacted by agriculture in the RBMP.
	National Action Programme under the Nitrates Directive (SI 378 of 2008 and SI 101 of 2009) will form the main Basic Measure for the Agri sector. NAP review in 2010 will be evaluation of implementation of f NAP and not its effectiveness	This comment has been noted
<b>Heritage Council</b> <b>SW_RBMP_19</b>	Suggest that DAFF undertake a programme to rehabilitate rivers affected by overgrazing, while also ensuring there are sufficient direct measures in place to reduce over-grazing itself.	This has been included in measures. Responsibilities have not yet been established.
<b>Central Fisheries Board</b> <b>SW_RBMP_25</b>	There are fears that the slurry storage periods prescribed in the Good Agricultural Practise Regulations, 2009 will not be adequate in order to fully protect important salmonoid waters.	The GAP agricultural catchments projects will evaluate this issue
<b>ICMSA</b> <b>SW_RBMP_27</b>	ICMSA strongly believe that there should be only one set of regulations and inspections under the Nitrates Regulations and that under no circumstances should any further supplementary measures be placed on the sector.	This is an implementation issue and is being considered by the relevant Government Departments.
	ICMSA think it is crucial that all bodies are cognisant of the period involved in achieving measurable benefits in terms of the effectiveness of the National Action Programme.	Work to evaluate the scientific basis for efficacy of measures and lag-time for recovery in water quality will be completed to support extended deadlines for some waterbodies impacted by agriculture in the RBMP.
<b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b>	Horticulture activities are not addressed in the Nitrates Directive and no measure in the Draft Plans that address this significant source of potential water pollution.	RBMP details controls that are in place for dangerous substances and Water Pollution Regulations are also included in basic measures.

Organisation	Agriculture	RESPONSE
	Agriculture has no additional measures proposed until review of GAP Regulations in 2010 which is after the RBMPs have been finalised. This is not adequate.	The GAP agricultural catchments projects will evaluate this issue
<b>An Taisce SW_RBMP_33</b>	<p>The adverse impacts of the fertilisers used in agriculture are perhaps not fully understood by all users, nor is the issue of cumulative impacts highlighted adequately.</p> <p>A low cost/no cost advisory service that provides good information to farmers would be an extremely useful initiative to be developed</p> <p>A major problem of farm waste holding facilities has recently come to light. These waste holding facilities are now installed and they have allowed for more waste to be generated yet they can often accommodate more waste than the land has capacity to absorb.</p> <p>Alternative disposal mechanisms for slurry (and municipal sludge) other than land spreading need to be provided.</p> <p>For farms in REPS there should be more emphasis on minimising slurry production and less on support for slurry storage.</p> <p>Additional financial incentives, such as bonuses, must be provided to encourage and promote environmentally sensitive farming.</p> <p>Farm checks under the (<i>European Communities (Good Agricultural Practice for Protection of Waters) Regulations 2006</i>), should be on-the-spot and without prior notice</p> <p>Slurry spreading (volume and inappropriate practices) must be reduced and controlled through the establishment and proper enforcement of appropriate agricultural bye-laws,</p> <p>Bio-digesters should to handle excess slurry waste</p> <p>Controls should be placed on the amount of fertilisers that can be purchased</p> <p>The REPS scheme should have more measures integrated with it to help protect water bodies.</p>	<p>The Sewage sludge Regulations &amp; the GAP Regulations are identified as statutory measures within the plan and the GAP agricultural catchment programme will identify the role of additional agricultural measures.</p>
<b>SWAN SW_RBMP_38</b>	<p>If DAFF are to take responsibility for enforcing the GAP regulations, DEHLG must retain an overseeing role in ensuring this is carried out correctly and effectively and is not in any way influenced by DAFF's close relationship and affinity with the agriculture sector.</p>	<p>Release of polluting material to waters is governed by basic measures including Water Pollution and GAP Regulations.</p> <p>This is an implementation issue and is being considered by the relevant Government Departments.</p>

<b>Organisation</b>	<b>Agriculture</b>	<b>RESPONSE</b>
<b>EPA</b> <b>SW_RBMP_41</b>	Programme for Farm Inspections for SW be set out.	This issue of farm surveys is an implementation issue and is being considered by the relevant Government Departments.

#### 4.4. Wastewater from unsewered properties

Organisation	Wastewater from unsewered properties	RESPONSE
<b>Cork County Council</b> <b>SW_RBMP_17</b>	There have been numerous presentations that indicate that 60 to 70 percent of all septic tank/percolation areas are not functioning properly in protecting groundwater, why then are we loosening as against tightening the standards.	The measures prescribe tighter standards. Certification of the construction of on-site wastewater treatment systems and percolation areas/polishing filters is required. Recently the European Court found Ireland to be in breach of EU law over its management of domestic waste water in terms of septic tanks. It is likely that legislation will be enacted in response.
<b>An Taisce</b> <b>SW_RBMP_33</b>	The filling and cleaning of slurry tanks and spreader tanks filling and cleaning, and cleaning of spreading equipment from water bodies, particularly lakes, is a significant threat, due to risk of leakage and should be prohibited so as to avoid contamination. Support systems are urgently needed to facilitate these activities to be done in a way that is not polluting.  The Draft Plan needs to specifically address the issue of contamination through private waste water systems not working efficiently.	Release of polluting material to waters is governed by basic measures including the 1977 Water Pollution regulations and GAP Regulations  This is included in the Plan's measures.
<b>SWAN</b> <b>SW_RBMP_38</b>	Proprietary treatment systems must be mandatory in all permissions for new one-off housing where soil percolation/assimilative capacity is insufficient.  Bye-laws (as in County Cavan) requiring certified annual de-sludging of septic tanks must be mandatory  A modest grant scheme to support the obligatory replacement of demonstrably failing septic tanks must be initiated in Protected Areas  Site assessment should be independently carried out, commissioned by the planning authorities in the case of private developments in order to avoid unduly pressure on companies doing site assessments.	Appropriate treatment is recommended for on-site systems.  Consideration of bye-laws is an issue for individual local authorities  This has been sent to DEHLG for consideration  This is included in Plan's measures

#### 4.5. Forestry

Organisation	Forestry	RESPONSES
<b>Department of Agriculture, Fisheries &amp; Food</b> <b>SW_RBMP_01</b>	All of the River Basin Management Plans should take more account of new statutory provisions covering the use phase of pesticides will be agreed at EU level during 2009, as part of the EU Thematic Strategy for Pesticides. The measures to be included in Irelands National Action Plan will be more comprehensive than those envisaged by the draft RBMPs.	This comment has been noted.
	It is regrettable that the focus in relation to forestry is solely on perceived pressures, with the result that the benefits of forest cover and forestry to the improvement or maintenance of water quality are not mentioned, let alone detailed. These draft management plans are the weaker as a result.	The plan acknowledges the necessity to focus on issues, however background documents set out the benefits of such activities.
	It is noted that the draft management plan for the Eastern River Basin District does not follow the same template as the others. This plan is not addressed here because the presentation of that Draft RBMP is such that it is extremely difficult to analyse in any meaningful way. It is strongly recommended that all plans adhere to the same template.	This comment has been noted.
	The Directive adopts a coordinated approach towards good water quality. However, the draft management plans place little emphasis on a more coordinated approach towards achieving its effectiveness – it seems that each pressure is taken in isolation.	Coordination is taken as an overall item in the action plan following identification of the individual issues and their measures.
	This latter is compounded by the fact that the management plans and their measures are not subject to an economic analysis that would enable prioritising measures on the basis of their value for money/resources and their effectiveness. The draft plans are less than complete for this reason.	Cost effectiveness analysis is required on a site by site basis.

Organisation	Forestry	RESPONSES
	<p>A strategy to achieve acceptable water body status will be needed which will involve a suite of measures, across a range of identified pressures, both diffuse and point source. The cost effectiveness of one measure over another measure has not been addressed in the draft management plans. A Cost Effective Analysis of each measure will need to be undertaken for different strategies. This analysis should form part of the final plan.</p>	
	<p>The implementation of the draft measures will require the co-operation of all stakeholders and to that end the Forest Service and forestry sector will require access to all of the relevant databases that were used in the formation of these plans and, in particular, those that will be necessary as part of decision support systems to implement the measures when the plan is adopted. Access to this information in an agreed format is essential to the proper implementation of the proposed measures and should be referenced in the plans. The proposed methodology for such sharing should be detailed.</p>	<p>This is the role of a high level implementation group.</p>
	<p>The draft management plans should also place greater emphasis on monitoring, reviewing and reporting the progress of the plans and on updating the national statutory bodies.</p>	
	<p>Some of the measures for forestry in the Draft Management Plans (e.g. in Table 10) are based on the results of limited studies. This should be stated and reference to these studies should be made more clearly in the plan.</p>	<p>A full analysis of all peer reviewed literature was undertaken as part of the Forest and Water POMS and additional research on a national scale undertaken for acidification, eutrophication and sedimentation pressures. The proposed measures were identified by a Working Group comprising of experts from Forest Service, Coillte Teoranta, COFORD, NPWS, EPA, Fisheries, Local Authorities, RBD Consultants and International Experts and Academics. The measures identified were supported by the research and literature surveys undertaken by UCD and UCC as part of the measures development and establishment of cause and effect. The Working Group recognised that some of</p>

Organisation	Forestry	RESPONSES
		the proposed measures would require to be trialled out at a catchment scale to determine their effectiveness. Some further research is being undertaken under the HYDROFOR Project which will assess some of the measures at catchment scale.
<b>Teagasc SW_RBMP_09</b>	<p>Teagasc is concerned about the large uncertainties surrounding the environmental effectiveness of some of the proposed Supplementary Measures. It is Teagasc's position that Supplementary Measures should only be introduced following catchment-specific evaluations of the cost-effectiveness of proposed measures.</p> <p>The proposed measures to mitigate acidification include avoiding or limiting afforestation on 1st and 2nd order stream catchments in acid-sensitive catchments and a revision of the Acidification Protocol. They also include remediation measures such as restructuring of existing forests and liming to mitigate acid impacts. Teagasc is concerned that the mechanism of acidification is not fully understood and needs further research to validate existing data. Consideration also needs to be given to the practicality and the costs associated with adopting such measures.</p> <p>Measures to mitigate eutrophication and sedimentation should be aimed at forest operations (including forest establishment, roading, harvesting, and replanting) rather than the extent of forest cover within a catchment. Measures should be targeted at the most vulnerable of the pre-1990 forests as younger sites have been established in accordance with Forest Service standards.</p> <p>Nutrient inputs tend to be much lower compared with agriculture and thus riparian forest planting may help to protect water quality within sensitive areas. Teagasc suggests that the most effective approach to changing species mix at the replanting stage, would be to concentrate</p>	<p>In the background document for Forest and Water it was clearly indicated that some measures will require their effectiveness to be assessed through further research and field trials before full implementation. Measures included in the plans were proposed as a suite of measures the most appropriate of which should be used following site specific assessments.</p> <p>The proposed limitation on percentage planting in acid sensitive first and second order stream catchments was established based on recent research undertaken as part of the WFD implementation. Further research is ongoing (Hydrofor Project) to validate the catchment % cover which could give rise to acidification issues and also to determine the extent downstream of the acid impact. However acid impacts were shown to occur based on coniferous forest cover above the thresholds indicated.</p> <p>The eutrophication measures and sedimentation measures are in fact aimed at forest operations such as establishment, roading, harvesting and replanting. Research did indicate that the likelihood of impact from these sources increased as forest cover in a catchment increased.</p> <p>Noted, although in some instances establishment of broadleaves in the aquatic zone may prove challenging.</p>

Organisation	Forestry	RESPONSES
	the planting of broadleaves (that are more nutrient demanding) in the aquatic zone.	
	Proposals to limit drainage should only be made on the basis of relevant research and should take the financial, practical and health and safety consequences into account. Few species will tolerate limited drainage which results in reduced crop productivity, excessive windblow and dangerous and inaccessible forests.	Limitation of drainage refers mainly to a move away from the type of drainage systems utilised pre 1990 after which the guidelines were introduced. Where buffer zones are been established there should be no drainage directly to watercourses and overland flow should be the preferred option.
<b>Waterford</b> <b>IFA</b> <b>SW_RBMP_28</b> <b>IFA</b> <b>SW_RBMP_43</b> <b>IFA</b> <b>SW_RBMP_04</b>	Proposed Supplementary measures for forestry must be based on scientific knowledge and not introduced unless the effect to water quality is known.	The proposed measures were identified by a Working Group comprising experts from Forest Service, Coillte Teoranta, COFORD, NPWS, EPA, Fisheries, Local Authorities, RBD Consultants and International Experts and Academics. The measures identified were supported by research undertaken by UCD and UCC as part of the measures development and establishment of cause and effect. The Working Group recognised that some of the proposed measures would be required to be trialled out at a catchment scale to determine their effectiveness. Some further research is being undertaken under the HYDROFOR Project.
	IFA strongly oppose the measure to limit or avoid afforestation on peat sites. The definition of peat sites needs to be very clearly described to avoid large sections of land being sterilised.	The definition of peat sites used in the Programmes of Measures and Standards for Forest and Water refers to Blanket peat, Fen Peat, Raised Bog and Cutaway Peat. In addition Peat soil is defined in the National Forest Inventory as peat with a depth of greater than 30cm on drained and 45 cm on undrained land. Research has indicated that these soil types are the most likely to give rise to water quality issues when associated with forestry.

Organisation	Forestry	RESPONSES
	<p>IFA recommends the Forest Service, Code of Best Practice and the Forest and Water Quality, Forest Harvesting and the Environment and Forestry and Aerial Fertilisation Guidelines are sufficient to satisfy the Water Framework Directive.</p>	<p>The Forest Service, Codes of Best Practice, Forest and Water Quality, Forest Harvesting will be the main measures for forestry and water management. These documents will be revised based on the work of the Forest and Water Working Group. The Aerial Fertilisation Guidelines have been superseded by the Aerial Fertilisation Regulations (European Communities (Aerial Fertilisation) (Forestry) Regulations 2006, S.I. No. 592 of 2007 and the European Communities (Aerial Fertilisation) (Forestry) (Amendment) Regulations 2007, S.I. No. 790 of 2007)</p>
	<p>Further research is required prior to the introduction of the Supplementary Measures to determine the full impact on water quality.</p>	<p>In the background document for Forest and Water it was clearly indicated that some measures will require their effectiveness to be assessed through further research and field trials before full implementation. Measures included in the plans were proposed as a suite of measures the most appropriate of which should be used following site specific assessments. Further research is being undertaken through the HYDROFOR Project funded by COFORD and the EPA. This research is focused at catchment scale and will test the effectiveness of some of the proposed measures.</p>
<p><b>Coillte SW_RBMP_23</b></p>	<p>S2: Strict adoption of Water Protection Guidelines would not pose same risk to water quality as previous to them. Coillte has serious reservations on restriction of forest cover on 1st and 2nd order streams in acid sensitive catchments.</p> <p>S3: Only by proper measuring the levels of pollution, combined with determining the acid sensitivity of the receiving waters can the most appropriate decision be made on the tolerable limit of forest cover in a sensitive catchment.</p>	<p>The proposed measures were identified by a Working Group comprising experts from Forest Service, Coillte Teoranta, COFORD, NPWS, EPA, Fisheries, Local Authorities, RBD Consultants and International Experts and Academics. The measures identified were supported by research undertaken by UCD and UCC as part of the measures development and establishment of cause and effect. The Working Group recognised</p>

Organisation	Forestry	RESPONSES
	<p>S4: Improved peats has an excellent potential for forest growth with minimal impact on water quality subject to strict adherence with Forest Service Guidelines. Approx 70,000 hectares would be deforested if this measure was implemented as currently drafted.</p>	<p>that some of the proposed measures would require to be trialled out at a catchment scale to determine their effectiveness. Some further research is being undertaken under the HYDROFOR Project.</p>
<p>S5: Too general. This measure s/b deleted or merged with S4</p>	<p>S6: More practical alternative would be to determine the percentage of a WB that can be felled over a three year period rather than capping the felling coup size.</p>	
<p>S7: The best time to restructure a forest stand is after clear felling. It is at this stage of the forest cycle that riparian zones are installed and drainage layout modified to comply with current Forest Service Guidelines. The feasibility of implementing a revised drainage layout and establishing riparian zones in a semi-mature no thin crop can only be considered on a site by site basis. Cognisance must be taken that the stability of the entire stand can be severely comprised arising from the implementation of these measures, the attendant and potentially serious impacts on the local water body and the considerable economic cost associated with this measure.</p>	<p>S8: Under current Coillte Best Management Practice, the drainage network of a stand is reviewed as part of the Environmental Impact Assessment prior to harvesting and subsequent re-stocking. Consideration is given to the best measures to be adopted to minimise the impact on the receiving local water body(ies) during and after the forest operations. This document is under constant review at this time and subject to alteration, change and further addition as the forest operations progress and additional protection measures are identified, implemented and documented.</p>	
<p>S9: This measure should merged with <b>S10, S11 and S23</b> and form part of an Integrated Pest Management plan for each Forest Property, including delaying re-stocking by 3 to 5 years (fallowing), use of pre-dipped plants, reduced pesticide usage and experimenting with alternate biological control methods.</p>		

Organisation	Forestry	RESPONSES
	<p>S12: This issue could be addressed if the location of the impacted water bodies were made known to Coillte and could be included in the relevant Forest Management Plans. Consideration should also be given for the relaxing of the Forest Service regulation of re-stocking sites within two years of felling to up to five years to facilitate greater diversity in age classes in the forest stand.</p>	
	<p>S13: Coillte would have serious reservations on the efficacy of the above measure to mitigate impacts in acid sensitive areas. The long-term benefits of liming Irish waters has not been demonstrated and thus would be of little use to the Forest Manager/Practitioner in buffering acid sensitive waters. Arising from the uncertainties surrounding this measure, it should be omitted from the suite measures and subject to further research.</p>	
	<p>S14: Similar to S13, this measure warrants further research prior to adoption in the field.</p>	
	<p>S15: While Coillte would be highly supportive of this measure, the cost of fencing and weed control would be very costly and would require grant aid if it was to be implemented across the whole estate.</p>	
	<p>S16: Where possible, Coillte will endeavour to install buffer zones in stands that were planted prior to the Guidelines. This issue can only be addressed on a site by site basis, the prime requisite been to minimise the impact on the water quality of the adjacent watercourses. The installation of buffer zones on 'no thin' semi-mature crops will be the most problematic and one that will require further research on how it can be implemented practically without de-stabilising the remaining crop and resulting in significant silt and nutrient runoff. To that end, a COFORD funded Woodlands of Ireland led project on Riparian Zones should provide the forest manager some advice on how this can be achieved.</p>	

Organisation	Forestry	RESPONSES
	S22: Coillte will at time of re-stocking optimise the drainage network to ensure that it complies with the Forest Service Guidelines. Nevertheless, by not draining some sites, most particularly on peat soils, serious damage to the subsequent rotation will occur leading to the loss of the crop, an option that Coillte cannot accept.	
<b>Central Fisheries Board</b> SW_RBMP_25	There is a need to re-align forest management plans with the river basin plans and in particular to ensure that supplementary measures in relation to forestry are applied.	Noted. Additionally specific forestry management plans will be required for sensitive catchments such as the Freshwater Pearl Mussel ( <i>Margaritifera margaritifera</i> ) catchments for which specific management plans have been prepared ( <a href="http://www.wfdireland.ie">www.wfdireland.ie</a> )
<b>Irish Wildlife Trust</b> SW_RBMP_29	It is necessary to address the challenge of getting the right type of forestry in the correct location within the plan.	Establishment of forestry can be very site specific and will be dependent on soil type and conditions, elevation, wind direction etc. Some measures within the plan are targeted at ensuring replanting and afforestation do not result in monocultures but are of suitable mixed species.
<b>An Taisce</b> SW_RBMP_33	If the damage from Forestry to water quality is to end, all supplementary measures in the draft plan need to be implemented without further delay (i.e. 2010). It is also important to include in the Plan that the choice of silvicultural system and forest management have a much larger role	In the background document for Forest and Water it was clearly indicated that some measures will require their effectiveness to be assessed through further research and field trials before full implementation. Measures included in the plans were proposed as a suite of measures the most appropriate of which should be used following site specific assessments. Further research is being undertaken through the HYDROFOR Project funded by COFORD and the EPA. This research is focused at catchment scale and will test the effectiveness of some of the proposed measures. It is also not possible to implement all measures immediately due to the complex nature of forest and water interaction. Some measures such as felling and no replanting may result in nutrient enrichment

Organisation	Forestry	RESPONSES
		problems due to the decay of brash and root structures left behind by the harvesting process for example.
	The problems associated with forestry have been so simplified by the Draft Plan they do not highlight the severity of some of water quality problems arising from past and current forest management practices.	The background document for Forest and Water clearly set out the issues and potential impacts that forests and forestry operations can have on water quality. The measures were designed to address these potential impacts.
	The report does not adequately emphasise the impacts of forestry plantations on native species and habitat loss	The WFD focuses on water quality aspects only and on these habitats and species dependent on water quality.
	There is a lack of the application of the precautionary principle in forestry operations, and while guidelines are meant to deliver safeguards there is little enforcement of ‘best practice’ guidance, in addition to the guidance being outdated, inadequate to deliver good water quality objectives, and contradictory.	This comment has been noted.
	Whilst the control of aerial fertiliser spreading over forestry from helicopters or aeroplanes through licensing regulations is a welcome step, it is An Taisce’s position that it should be totally prohibited.	This comment has been noted.
	The current approach of the Draft Plan to apply more stringent measures in the most sensitive areas is neither comprehensive nor does it tackle wider issues of water quality deterioration from forestry outside of ‘the prioritised areas’.	Separate specific sub basin plans are been prepared for the protection of sensitive areas, specifically for the Freshwater Pearl Mussel Catchments in designated cSAC areas. The water quality requirements in these areas are more stringent and any forestry operations must comply fully with these requirements. The sub Basin Plans for FPM Catchments have additional forestry measures ( <a href="http://www.wfdireland.ie">www.wfdireland.ie</a> )
	As previously mentioned the RBD needs a far more proactive approach be taken, as this will ensure that the forest service (and other responsible authorities) adopt comprehensive and cohesive preventative measures to avoid water pollution from forestry, in accordance with various European policy requirements.	RBD Conservation Groups are being established to coordinate activities relating to sensitive catchments in each RBD.

Organisation	Forestry	RESPONSES
	Ireland needs to urgently move away from the over reliance on alien exotic conifers which are the source of the many water quality problems. Instead of the Draft Plan ‘encouraging sustainable, commercial afforestation’, it should be encouraging sustainable (i.e. socially, environmentally, and economically), forestry, including a major restructuring of the state forest holding and more balanced incentives for private afforestation.	This comment has been noted.
	Forestry Grant Applications should be mapped by Department of Agriculture & Food in to a GIS format that could be used alongside the watermaps tool. This would assist in the identification of impacts of forestry in upland areas which source river systems.	Forestry Grant Applications are currently mapped through the DAFF Forest Service IFORIS System. All forestry grant applications are made online to this mapping system. This allows the Forest Service to review the likely potential impacts and decide on their suitability. In addition mapping from the WFD has been provided to the Forest Service to enable them assess potential; impacts of new forest grant applications also.
<b>SWAN SW_RBMP_38</b>	Remove obligation under 1947 Forestry Act to replant all felled areas	The 1946 Forestry Act has been under review for some time and this issue is under consideration. The Minister does have the power under the existing Act to waive the requirement for replanting.
	Enforcement of Code of Good Practise as mandatory	This comment has been noted. Elements of the Code are included in the measures.
<b>EPA SW_RBMP_41</b>	RBD specific forest coverage stats should be included in each plan. (Recommended)	This comment has been noted.

#### 4.6. Dangerous Substances

Organisation	Dangerous Substances	RESPONSES
<b>Animal &amp; Plant Health Association Ltd</b> <b>SW_RBMP_16</b>	<p>As farmers are by far the majority users of Plant Protection Products we would be of the opinion that in order to communicate with the widest user audience then we would recommend that all future publications should aid the final user in their awareness campaign and not make particular issues difficult to find by including them in areas that the stakeholder is unlikely to read. Farmers in general would not consider themselves to be using dangerous substances as the vast majority of substances will be authorised and regulated under Reach, Pesticide Control Service or the Irish Medicine Board.</p>	<p>Comment noted. However plant protection products are also used by other sectors and the intention of the plan in terms of dangerous substances, including plant protection products, must be communicated to all sectors. The HSA are carrying out awareness raising work under the remit of REACH and an awareness campaign is proposed for the general public.</p>
	<p>Priority Substance Control and Relevant Pollutants.</p> <p>While a number of active ingredients are designated under the WFD directive, we suggest that all designated actives and specific relevant pollutants and their associated threshold values be agreed across all member states. In particular, where Ireland has cross border river basin catchment areas. It would be appropriate to have the same substances listed and the same threshold values agreed to avoid differing scenarios in different catchments across the same island.</p>	<p>Environmental quality standards for various specific pollutants, priority substances and priority hazardous substances are prescribed in the European Communities Environmental Objectives (Surface Water) Regulations, 2009. These standards have been adopted from European legislation, namely Directive 2008/105/EC of the European Parliament and of the Council on environmental quality standards in the field of water policy (Priority Substances Directive). Therefore the same quality standards must legally be employed cross-border.</p>
	<p>Point &amp; Diffuse; Sources Agriculture. Page 33.</p> <p>Regrettably, only focus on Nutrients. The target stakeholder of farmer will not appreciate that pesticides are covered in another section. An excellent opportunity to introduce the proposed National action plan on sustainable use of Pesticides.</p>	<p>The EU Commission is developing a strategy for sustainable use of pesticides focusing on the use-phase in the life cycle of pesticides and introducing specific measures to protect waters from the impact of pesticides.</p>

Organisation	Dangerous Substances	RESPONSES
	<p>Priority Substance Page 67.</p> <p>Despite references in other parts of the booklet to agricultural pesticides being included in the Priority substances and relevant pollutants there is no mention in relation to agriculture. I realise that there are very few pesticides mentioned under the priority substances and relevant pollutants, therefore it is even more critical that they are covered in the relevant agriculture section.</p>	<p>Comment noted.</p>
<p><b>SWAN</b> <b>SW_RBMP_38</b></p>	<p>The treatment of drinking water supplies with chlorine, fluoride and aluminium must be independently reviewed</p>	<p>This matter was reviewed recently by the Department of Health and it was decided that the current policy should be retained subject to some changes, the most significant of which was the reduction in the concentration of fluoride.</p>
	<p>Conduct a public awareness campaign on the use and disposal of a range of household chemicals: oils, detergents, paints, solvents, etc.</p>	<p>The HSA are carrying out awareness raising work under the remit of REACH and an awareness campaign is proposed for the general public.</p>
<p><b>Central Fisheries Board</b> <b>SW_RBMP_25</b></p>	<p>The fact that Phosphorus has been designated a dangerous substance under the WFD has not been highlighted in the plans and the general public must be informed of this.</p>	<p>Phosphorus is listed as a General Quality Parameter in the WFD monitoring programme and has been included in the monitoring programme. An EQS has been also set for Molybdate Reactive Phosphorus (MRP) under the following regulations S.I. No. 272 of 2009. An awareness campaign is proposed for the general public</p>
<p><b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b></p>	<p>Chlorine and fluoride should be seriously investigated in Ireland. Its use can potentially mask ecological problems that should be addressed.</p>	<p>This matter was reviewed recently by the Department of Health and Children as it is principally a public health issue and outside the remit of the RBMP. It was decided that the current policy should be retained subject to some changes, the most significant of which was the reduction in the concentration of fluoride. The use of chlorine as a disinfectant for drinking water has a long history, and it is the principal mechanism for ensuring the delivery of safe drinking water to consumers and protecting human health.</p>

#### 4.7. Physical Modifications Abstractions

Organisation	Physical Modifications	RESPONSES
<b>Mills and Millers of Ireland</b> <b>SW_RBMP_05</b>	Within the list of rivers specified in your Plan are a number that can and should be considered as potential sites for generation of hydro power. While the number of active mills is now small, information is available that designates and evaluates numerous potential sites. This potential does not in our view receive adequate attention in the South Western River Basin Management Plan.	Restoration measures are being considered as part of the measures and controls required by Article 11(3) of the WFD to ensure that the hydromorphological conditions are consistent with the achievement of the required ecological status. Any alterations to the hydromorphological conditions through the generation of hydro power must therefore be consistent with the achievements of the required ecological status and will be considered on a case by case basis.
<b>ESB</b> <b>SW_RBMP_10</b>	ESB operates hydro-electric plants at two locations on the River Lee, Carrigadrohid and Inniscarra. ESB welcomes the recognition that the benefits from these plants need to be retained, by the designation of water bodies associated with them as heavily modified. As well as routine electricity generation, these roles include water level control, flood control, public safety, dam safety, water supply, recreation, management of fisheries, rapid response to electricity system demands, black-start capability, etc. These multiple roles often place restrictions on the operation of the reservoirs and discharges to the river downstream. They all need to be taken into account in relation to the investigation or implementation of measures for the relevant waterbodies.	Comment noted.
<b>Heritage Council</b> <b>SW_RBMP_19</b>	Historical modifications to our waterbodies. It may arise that there are conflicts between the needs of aquatic biodiversity and those of the cultural heritage in the “impassable barriers remediation scheme”. These should be dealt with on a case by case basis	Additional measures may be needed to restore good status to waters impacted by historical morphological schemes - this will be dealt with on a case by case basis. Restoration measures are being considered as part of the measures and controls required by Article 11(3) of the WFD to ensure that the hydromorphological conditions are consistent with the achievement of the required ecological status.

Organisation	Physical Modifications	RESPONSES
	Funding should be allocated to addressing historical modifications, as appropriate, and to enhancing channels affected by earlier drainage works.	Channel enhancement priorities may be considered as part of the River Enhancement Programme. This comment has been noted and forwarded to OPW for consideration.
	The Council requests that measures take account of historic features and urban landscapes in relation to additional flood defence work.	Provision of additional flood defence work is outside the remit of this plan but will be addressed under the implementation of the Floods Directive. Any plans developed under this directive will be subject to SEA which will be required to consider cultural impacts. Also current practice is for flood alleviation projects to fully comply with the Environmental Impact Assessment (EIA) legislation, which includes cultural impacts. Further, the public participation aspects of the Floods Directive must be considered with those of the Water Framework Directive.
	It would be beneficial if the RBDMPs clarified if hard coastal protection structures qualify as “physical modification”, as there are likely to be calls for more of this type of structure in the future	These were considered to be physical modifications in the assessments of marine morphology under the WFD.
<b>Industrial Heritage Association SW_RBMP_20</b>	In the case of mill-related waterworks, in particular, any negative impacts thereon would also have a detrimental effect on the mills themselves. Although mills are one of the most prevalent types of industrial site in Ireland, only a handful are now operational. It is therefore essential that the futures of those which have the potential to be restored to working order are not jeopardised through the destruction of their associated waterworks. The retention of such structures will also leave open the future possibility of the small-scale generation of hydro-electricity.	Provision of modification of weirs, mill and auxiliary structures will be subject to SEA which will be required to consider cultural impacts. Also current practice is for flood alleviation projects to fully comply with the Environmental Impact Assessment (EIA) legislation, which includes consideration of industrial heritage.

Organisation	Physical Modifications	RESPONSES
<p><b>South Western Regional Fisheries Board</b> <b>SW_RBMP_21</b></p>	<p>Physical Modifications; The Freshwater Morphology Study Report acknowledges that there is a legislative gap in relation to the specific control of instream physical modifications.</p> <p>There are several rivers in the South West randomly and frequently dredged, without authorisations, for various reasons such as flooding control, land drainage etc. These works are currently exempted development under the Planning Acts and the continuation of this practice may have significant implications for the maintenance of good status of waters in all catchments. Without specific regulatory control on in-stream works existing Legislation is ineffective in the management of water ways.</p> <p>It is recommended that additional measures, in the form of regulatory controls be introduced to control physical modifications, including codes of practice and varying levels of authorisation – registration/notification and licensing to prevent deterioration in ecological status of waters.</p>	<p>Agreed. The development of new morphology regulations creating a registration and authorisation system is included as a measure in the plan.</p>
	<p>Instream Barriers: Fragmentation, particularly when due to infrastructure development, reduces the opportunities for organisms to disperse and affects their ecological needs. It is recommended that the assessment of barriers for determining river continuity be completed and a priority based approach to the removal of these barriers put in train with targets set for the removal of X numbers of barriers by 2015.</p>	<p>Measures proposed in the plan include impassable barriers investigation at prioritised sites and impassable barriers remediation schemes at prioritised sites</p>

<b>Organisation</b>	<b>Physical Modifications</b>	<b>RESPONSES</b>
SWAN SW_RBMP_38	The Land Drainage Act must be revoked to remove the incentive for modifying wetlands and riparian areas through drainage.	Artificial drainage schemes to improve agricultural productivity were traditionally carried out on a catchment basis to allow for the fact that the whole catchment acts as a unit. As required by the Arterial Drainage Acts 1945 to 1995, no flood alleviation or land drainage works are carried out without due regard to the downstream effect of the proposal on hydrology and flow patterns.
	Clarification on the treatment proposed for culverts is requested - Will they be retained or removed to restore streams	Physical Modification Measures are included for impassable barriers investigation in 4507 waterbodies nationally. Culverts can act as potential barriers to fish migration and are therefore are incorporated into the impassable barriers investigation, which will be carried out on a case by case basis.

#### 4.8. Abstractions

Organisation	Abstractions	RESPONSES
<b>Cork County Council</b> <b>SW_RBMP_17</b>	Drinking Water: The DOEHLG does not ensure that adequate funding is in place and only provides portion of all funds required. It has an abysmal record in providing adequate resources for both water & sewerage schemes over many decades.	Comment noted.
	Reducing Abstraction pressures: delighted to see domestic metering & charging mentioned.	Comment noted
	It is incorrect to state that no such physical modifications have been proposed when we are fighting the Bantry WSS abstraction in the courts and it has been proposed for many years now.	This statement refers to new modifications for which alternative objectives may be applied in accordance with Article 4 (7) which states that 'Member States will not be in breach of this Directive when: - failure to prevent deterioration from high status to good status of a body of surface water is the result of new sustainable human development activities. The RBMP is to include a list of all proposed physical modifications or sustainable developments. Public Bodies have been contacted by the RBD in order to identify all future physical modifications or sustainable developments likely to take place in this plan cycle. The Bantry WSS will be included in this list.
<b>Heritage Council</b> <b>SW_RBMP_19</b>	Hopes that RBDPs are sufficiently robust to cope with potential changes in our precipitation patterns and increased demand for human drinking water and potential impact to aquatic ecosystem as a result.	Measures have been assessed in relation to predictive climate change using European Union recommendations. A Strategic Environmental Assessment has been undertaken to assess the wider environmental impacts of this plan including climate change issues.
<b>South Western Regional Fisheries Board</b> <b>SW_RBMP_21</b>	Abstraction and Physical Modification of waters. The National Programme of Measures Reports (POMs) on Abstraction Pressures and River Morphology has identified the need for regulatory control and authorization systems.	Correct. The RBMP includes the basic measure to Develop new morphology regulations creating a registration and authorisation system

Organisation	Abstractions	RESPONSES
	<p>Abstractions: Water Services assessment needs generally emphasis the protection of the quality of the water resource for supply however the availability of the resource for abstraction has not heretofore been afforded the same consideration and there is a lack of information on source supply. There are also many abstractions within designated Protected Areas and to insure compliance with specified ecological objectives in these and other waters-. The Programme of Measures should include;</p> <p>The regulation of all water supplies under the Water Supplies Act or other new legislation with Water Abstraction Orders for each abstraction based on allowable limits by 2015.</p> <p>The introduction of Catchment Abstraction Management Strategies on all waters which have been identified as “at risk” from abstraction. It must also be acknowledged that protection of fisheries and river ecology through setting minimum in-stream flow requirements will result in periods of time when abstractions from small rivers would not be permitted. This regulation of waters will provide information for the future requirements of alternative source needs. E.g. storage reservoirs, alternative sources, conservation measures.</p>	<p>The WFD requires the development of new abstraction regulations to update and extend existing abstraction legislation creating a registration and authorisation system for abstractions and impoundments. The DEHLG will propose new regulations creating a single registration and authorisation system. Authorisations would apply to surface waters and groundwaters, and may be risk-based including registration of all abstractions above a specified abstraction threshold. Previous work on the Initial Characterisation of risk from abstraction impacts prepared in response to Article 5 of the Water Framework Directive used the concept of 'net abstractions' in a water body, accounting for cumulative impacts. The application process will identify any monitoring or assessment requirements.</p>
<p><b>Irish Concrete Federation</b> <b>SW_RBMP_26</b></p>	<p>Rain Water Harvesting: ICF believes that rainwater harvesting should be in place for the extractive industry.</p>	<p>This has been included as a measure for abstractions.</p>

Organisation	Abstractions	RESPONSES
<b>Independent Farmers' Federation SW_RBMP_30</b>	Urges elected member to reject proposed attempts by EU and DEHLG to scale back in groundwater abstraction when the plan is placed in front of them for decision.	The WFD requires a registration and authorisation system to control impacts of abstractions. Measures and controls to ensure that both groundwater and surface water abstractions conditions are consistent with the achievement of the required status have to be established in response to Article 11(3) of the WFD.
<b>An Taisce SW_RBMP_33</b>	<p>Water saving strategies have not been addressed in the Draft Plan. A recent report published by Forfás notes that despite significant investment in water capacity in recent times, Ireland face every prospect of water shortages by 2013. Leakage from water supply systems accounts for as much as 45% of the water in distribution systems in some urban areas. The Directive requires measures to promote efficient and sustainable water use. This is being supported by programmes such as the national water leakage reduction programme, implemented under the Water Service Investment Programme. However, this is only briefly mentioned the Plan as a 'national water conservation programme is being implemented to reduce leakage and support sustainable water use'.</p> <p>A transboundary water conservation programme needs to be developed and implanted by each Plan, to help raise awareness and provide information to the public.</p>	<p>As part of the Education and Public Awareness campaign, raising general awareness and providing information about specific water issues and their solutions, including water saving strategies, at national levels will help with water management, and forms part of the locally focused and future issues under the Plan's measures.</p> <p>This comment has been noted and forwarded to the DEHLG.</p>
<b>Waterford IFA SW_RBMP_28 IFA SW_RBMP_43 IFA</b>	County Councils should pay for an annual internal charge for historical under-investment in water infrastructure. DOE should establish leakage reduction targets for Local Authorities and highlight the consumer cost reduction,	There are National water conservation projects underway

Organisation	Abstractions	RESPONSES
SW_RBMP_04	<p>where such leakage reductions take place.</p> <p>Propose 3 year price freeze of water charges at 3.50 per thousand gallons and the development of a water conservation fund to encourage use of rainwater harvesting and pasture pumps.</p>	<p>Comment noted and has been passed to relevant authority for consideration.</p>
<b>Dept. Communications, Energy &amp; Natural Resources, SW_RBMP_34</b>	<p>Noted that new prior authorisation of abstraction and impoundment activities will be introduced and will take form of abstraction licensing system. DCENR are of the understanding that DEHLG will develop this but lag behind in licensing groundwater abstractions. To equally protect fisheries interests in the context of surface water abstractions all licensing systems/prior authorisation systems must be developed in parallel with each other thus keeping Ireland in compliance with Article 11.3(e) of the WFD.</p>	<p>This comment has been noted and forwarded to the DEHLG for consideration under RIA process.</p>
<b>Cork Environmental Forum SW_RBMP_35</b>	<p>Water treatment</p> <ul style="list-style-type: none"> <li>• The use of chemicals in drinking water treatment should be stopped. Many of these chemicals are banned elsewhere (e.g. fluoride and aluminium). Their use is a sign of fire fighting to secure drinking water supplies where sufficiently clean water is not available. The problem of poor water quality at source has to be addressed.</li> <li>• Water charging – different opinions were voiced about the merits and appropriateness of charging for domestic water use. Some felt it to be a necessary means of getting the public to value water, generate finance for water-protection, and to reduce waste/unnecessary</li> </ul>	<p>The use of chemicals in drinking water treatment was reviewed recently by the Department of Health and it was decided that the current policy should be retained subject to some changes, the most significant of which was the reduction in the concentration of fluoride. The objective of the Water Framework Directive is to achieve 'good status' in all our waters which is to include water used for human consumption. Public participation has been a significant part of the implementation of the Water Framework Directive, part of this public participation involved the generation of public awareness on water issues including water conservation. It is recognised that a national campaign would assist in raising public awareness to the value of water. There are also various programmes in place to promote water conservation e.g. the Sustainable Energy Ireland Greener Homes Scheme.</p>

Organisation	Abstractions	RESPONSES
	<p>water use. Others felt charging was not appropriate as water is a life-supporting, common heritage. It was agreed that it is vital to ensure all citizens appreciate the value of water, and are involved in action to protect its quality, including reducing use (since used water, however un-polluting the use, ends up in the waste stream and is therefore contaminated). This is not dealt with in the Plan.</p>	
<p><b>SWAN SW_RBMP_38</b></p>	<p>A central authority must be established, independent of the local authorities to oversee abstraction licensing, take responsibility for ensuring cumulative impacts of abstraction are not damaging to good water status, and to enforce controls on abstraction.</p> <p>A definition of “significant” abstractions must be provided and justified.</p> <p>Recharge data must be ascertained and available for each abstraction proposed.</p>	<p>The DEHLG will propose new regulations creating a single registration and authorisation system. Authorisations would apply to surface waters and groundwaters, and may be risk-based including registration of all abstractions above a specified abstraction threshold. Previous work on the Initial Characterisation of risk from abstraction impacts prepared in response to Article 5 of the Water Framework Directive used the concept of 'net abstractions' in a water body, accounting for cumulative impacts. The application process will identify any monitoring or assessment requirements.</p>
<p><b>Shay Murtagh Ltd SW_RBMP_39</b></p>	<p>Rainwater harvesting should be promoted.</p>	<p>These are included as measures for abstractions</p>
<p><b>EPA SW_RBMP_41</b></p>	<p>Develop and Integrate a Drinking Water Safety Plan approach to identification of potential polluting hazards, risks and mitigation measures for critical source risks identified.</p>	<p>Preparation of the Water safety plans are a basic requirement of the Water Regulations and are as such a basic measure. This is already acknowledged in the plan.</p>

#### 4.9. Invasive Alien Species

Organisation	Invasive Alien Species	RESPONSES
<b>Waterford IFA</b> <b>SW_RBMP_28</b> <b>IFA</b> <b>SW_RBMP_43</b> <b>IFA</b> <b>SW_RBMP_04</b>	Ireland must set clear targets for water quality in bays and Shellfish designated areas to ensure no bay falls below criteria for water quality as explained in Code of practice for Microbiological Monitoring of Bivalve Mollusc Production areas.	The EU Shellfish Waters Directive, as transposed by S.I. 268 of 2006 and as amended by S.I. 55 of 2009, contains these targets. Pollution reduction plans for each of the 63 designated shellfish waters in Ireland are available through <a href="http://www.environ.ie">www.environ.ie</a> .
<b>Heritage Council</b> <b>SW_RBMP_19</b>	Hopes that the emphasis of the RBD will result in sufficient funding to be made available to restrict the spread of invasive species in our water bodies.	The significant potential impacts from the spread of invasive species have been recognised at the National and European level. As such both National and European funding is been made available to address the issue through research and the development of action plans to both control and eradicate invasive species in Ireland.
<b>Central Fisheries Board</b> <b>SW_RBMP_25</b>	Imperative that authorities implement extra measures to stop the importation and further spread of non-native/exotic species in Ireland, particularly in the northwest and west where many waterbodies are in reference state in terms of fish species and free from non-native introductions.	The DEHLG are considering under the Wildlife Act 1976 section 52(7) the introduction of regulations to prohibit the possession or introduction of any non-native species that may be detrimental to native species.
<b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b>	Clear guidance on who is responsible for what tasks, and how agencies and actors work together, as well as adequate resources are necessary if the Draft Plan is to be genuine in attempting to deal with such issues. Waiting for results of studies will simply let the problem worsen and ultimately cost more.	This comment has been noted and will be considered in the development of measures and controls in relation to the control and eradication of invasive alien species.
<b>An Taisce</b> <b>SW_RBMP_33</b>	The Draft Plan does not appear to address the issue of invasive species at all, even though this is an area of increasing concern, especially the Pacific Oyster in this region.	Invasive alien species are addressed under locally focused and future issues. Possible measures generally necessitate focused management and enforcement actions that will be coordinated at District level. They include supporting measures being developed by the national alien species study and local investigations at District level.

Organisation	Invasive Alien Species	RESPONSES
<b>SWAN SW_RBMP_38</b>	Lists of known invasive alien species must be included in Plans.	Agreed. The National Parks and Wildlife Service are involved in developing supporting measures through the national alien species study and local investigations at District level. Once available the list should be incorporated into the Plan upon review in 2011.
	RBD Management Plans must make clear which agency/ies has responsibility for tackling invasive alien species, the resources available to do this, and their ability to command compliance from others in delivering this task.	The National Parks and Wildlife Service and the Northern Ireland Environment Agency jointly commissioned the 'Invasive Species in Ireland Project ' in 2006. There are number of other stakeholders and State agencies such as the Central Fisheries Board and Regional Fisheries Boards involved. The purpose of this study is to develop alien species actions plans for their control and eradication. As study is currently on-going and not yet complete, the requested information can not be included at this time.
	RBD Management Plans must make clear who is responsible for handling situations where alien species were licensed for introduction to water bodies, but which have subsequently become invasive.	This comment has been noted. However this issue would be better addressed by the NPWS during preparation of the national invasive species study.
	The sale of all known invasive alien species, especially priority species already known to be causing serious problems should be banned immediately with emergency legislation	The DEHLG are considering under the Wildlife Act 1976 section 52(7) the introduction of regulations to prohibit the possession or introduction of any non-native species that may be detrimental to native species.
<b>EPA SW_RBMP_41</b>	IAS of particular concern in each RBD s/b identified specifically	Agreed. The NPWS are involved in developing supporting measures through the national alien species study and local investigations at District level. Once available the list should be incorporated into the Plan upon review in 2011.

#### 4.10. Aquaculture

Organisation	Aquaculture	RESPONSES
<b>Department of Agriculture, Fisheries &amp; Food</b> <b>SW_RBMP_01</b>	It should be pointed out that the shellfish waters pollution reduction plans are not aimed at reducing pollution from shellfish aquaculture but are in fact plans aimed at reducing pollution levels	This clarification has been noted.
	All finfish farm applications are required to submit an environmental Impact statement as part of their application. All licences contain relevant terms and conditions for monitoring the benthic impact of finfish farms and of water quality and sea-lice control is managed through a monthly regime of sampling and treatment where appropriate. DAFF is currently in discussion with NPWS and the EU Commission to develop processes to ensure that aquaculture licensing conforms to the requirements for conservation and protection of Natura 2000 sites.	This comment has been noted
	Should be noted that initiatives are being discussed at EU level in relation to halting the loss of biodiversity and addressing the threats from invasive alien species. These discussions are likely to lead to a revised EU commitment on halting the loss of biodiversity and the preparation by the European Commission of a Thematic Strategy on Invasive Alien Species.	This comment has been noted
<b>Cork County Council</b> <b>SW_RBMP_17</b>	Severe algal blooms are a regular occurrence in Ballinlough and Abisdealy Lake and have also been experienced in Curraghlickey & Bofinna.	This comment has been noted

<b>Organisation</b>	<b>Aquaculture</b>	<b>RESPONSES</b>
<b>Kerry Anglers' Federation</b> <b>SW_RBMP_18</b>	<p>Under Aquaculture on page 10 the section dealing with possible effects should include a phrase as follows:</p> <p>There is substantial scientific evidence of damage to migrating salmon and sea trout from sea lice populations in caged salmon farms. Under the action plan of the same subsection there should be a phrase that states: new salmon farm licences should not be granted to fish farms in salmonid estuaries. Existing licences should not be renewed.</p>	<p>The licensing of finfish farms is the under the remit of DAFF in accordance the Fisheries (Amendment) Act, 1997. All finfish farm applications are required to submit an environmental Impact statement as part of their licence application. Applications are assessed on a case by case basis. All licences granted contain relevant terms and conditions for monitoring the impact of finfish farms which will include Sea-lice control as appropriate. Sea-lice control should be managed in accordance with 'A strategy for improved pest control on Irish salmon farms' published by DAFF in 2008. Aquaculture licence applications may be subject to appropriate assessments under the Natural Habitats Regulations if located within or close to Natura 2000 sites. DAFF is currently in discussion with NPWS and the EU Commission to develop processes to ensure that aquaculture licensing conforms to the requirements for conservation and protection of Natura 2000 sites.</p>
<b>South Western Regional Fisheries Board</b> <b>SW_RBMP_21</b>	<p>Alternative Energy- Micro hydro: There is renewed interest in hydro power as an energy resource for the generation of electricity. Such schemes can impact on the ecological status of waters and the recent publication “Guidelines on the Planning, Design, Construction and Operation of Small-scale Hydro Electric Schemes and Fisheries” provides information for developers, planners and interested groups on specific requirements for fisheries water and habitat protection. Criteria contained in these guidelines should form the basis for fisheries protection.</p>	<p>Comment noted. Full account must be taken of the potential impact on fish and other relevant species and habitats when constructing hydro-power schemes. Consideration should be made at the design stage to measures to mitigate impact. Environmental impact assessment should be carried out as necessary. All relevant recommendations and guidance should be considered.</p>
<b>Waterford IFA</b> <b>SW_RBMP_28</b> <b>IFA</b> <b>SW_RBMP_43</b> <b>IFA</b>	<p>Ireland must set clear targets for water quality in bays and Shellfish designated areas to ensure no bay falls below criteria for water quality as explained in Code of practice for Microbiological Monitoring of Bivalve Mollusc Production areas.</p>	<p>The EU Shellfish Waters Directive 'as transposed by S.I. 268 of 2006 and as amended by S.I. 55 of 2009' contains these targets. Pollution reduction plans for each of the 63 designated shellfish waters in Ireland are available through <a href="http://www.environ.ie">www.environ.ie</a>.</p>

<b>Organisation</b>	<b>Aquaculture</b>	<b>RESPONSES</b>
<b>SW_RBMP_04</b>		
<b>Irish Wildlife Trust SW_RBMP_29</b>	Local pressures or adequate measures to address aquaculture are not recognised or adequately addressed in the draft Plans	Measures for aquaculture activities entail licensing as described above.
<b>An Taisce SW_RBMP_33</b>	Aquaculture still not adequately addressed within the Draft Plan. Whilst it has been added nominally as a significant water management issue following the ‘Water Matters’ consultation response, the significant water quality and ecological pressures that can arise from aquaculture operations are still not recognised or adequately addressed in the Draft Plan.	Aquaculture was given due consideration in the production of the River Basin Management Plan as a significant water management issue following comments received during SWMI consultations. Also a Strategic Environmental Assessment has been undertaken to assess the wider environmental impacts of this plan including aquaculture issues. The plan states the licensing controls in place and contains links to the Shellfish Waters pollution reduction programmes.
<b>Dept. Communications, Energy &amp; Natural Resources, SW_RBMP_34</b>	Aquaculture should include Cork, Galway and Donegal as having highest number of aquaculture licences	The plan is focused on the South Western River Basin District and therefore does not include reference to Counties outside the RBD. The Plan highlights the West Cork area as having a high level of mussel farming.
<b>SWAN SW_RBMP_38</b>	The impact of aquaculture installations on surrounding habitats is not addressed in the draft Plan.	Aquaculture was given due consideration in the production of the River Basin Management Plan as a significant water management issue following comments received during SWMI consultations. Also a Strategic Environmental Assessment has been undertaken to assess the wider environmental impacts of this plan including aquaculture issues.

<b>Organisation</b>	<b>Aquaculture</b>	<b>RESPONSES</b>
	<p>Aquaculture is a Significant Water Management Issue and must be dealt with robustly in the Action Plan, with specific measures, for marine based aquaculture - as part of an Integrated Coastal Zone Management Approach and for land based aquaculture - as part of Fisheries, Planning &amp; Development Regulations, and Wastewater &amp; Industrial Licences.</p>	<p>Aquaculture activities are licensed or will fall under future licensing controls. The Department of Agriculture, Fisheries and Food intends to implement regulations to control the discharge of certain substances used in the operation of finfish farms located in marine waters. The regulations will establish water quality standards for receiving waters for specific substances; impose discharge limits for certain substances as a condition of an aquaculture licence; establish a programme of measures relevant to aquaculture to protect water quality. These regulatory controls together with the recently introduced surface water quality regulations provide for management of aquaculture activities.</p>

#### 4.11. Protecting High Quality Areas

Organisation	Prot High Q Areas (FWPM)	RESPONSES
<b>BirdWatch Ireland SW_RBMP_02</b>	Concerned of the lack of consideration of national and local priority species, habitats and sites including previously proposed NHAs, wetlands beyond the boundaries of designated sites etc.	The location and protection of these sites will be integrated into Local Authority Plans and Programmes. Since all sites have not yet been identified and mapped by NPWS a recommendation is being made that NPWS develop an online database of these sites, regularly update it and provide such updates to Public Authorities and other statutory bodies. The implementation of Local Biodiversity Action Plans would give particular cognisance to the importance of conserving wetland areas at the local level and through development control and control of illegal dumping on such sites.
<b>Kerry Co Co SW_RBMP_13</b>	Freshwater Pearl Mussel The assignment of a default “moderate” status to water bodies designated under the Habitats Directive on account of the presence of the freshwater pearl mussel does not appear to be reasonable. By their nature, waters in which the Freshwater Pearl Mussel is present are considered to be of the highest quality and, in these circumstances, it is difficult to accept that a moderate status is warranted.	Freshwater Pearl mussel populations are not reproducing due to unfavourable water quality conditions and are considered to be at Unfavourable Conservation Status. Ireland must maintain or restore the species to favourable status as defined in the Habitats Directive and S.I. 296 of 2009. The pearl mussel is being directly measured to ascertain its conservation status. The designated pearl mussel rivers in Ireland can be construed as being a specific river type with the Freshwater Pearl Mussel being an intrinsic biological component. The decline of pearl mussels in this river type represents a very significant deviation from reference conditions and for this reason it is considered reasonable to classify as moderate. Also since the mussels are part of the macroinvertebrate community it reflects in the overall moderate classification of the river. Appropriate measures as outlined in the pearl mussel sub-plans should be employed in order to restore the populations to favourable conservation status.

Organisation	Prot High Q Areas (FWPM)	RESPONSES
<b>Kerry Anglers' Federation</b> <b>SW_RBMP_18</b>	The argument for qualifying the core objectives is that a control and enforcement approach will not work. The private sector must be enlisted as active participants. For example if it was arbitrarily decreed that there should be no fishing in a pearl mussel protected zone, the owners/managers of the fishing resource in that zone will make sure that there are no pearl mussels left and the authorities will be unable do anything about it. On the other hand if it was handled so that the owners/ managers of a pearl mussel protected zone were consulted, encouraged and rewarded for their cooperation (in kind or in recognition) on a voluntary basis there is a much greater chance of success at a cheaper cost. It should also be borne in mind that the explanatory documents from the EU stress the importance of co-operation and participation on the ground in all conservation measures.	Comment noted. Public consultation throughout the development of the Plan has aimed to build awareness of the importance and value of the pearl mussel and the importance of improving water quality. The RBD has in particular worked closely with the farming community to build awareness and understanding of the project through public consultations and also by involving the IFA in project meetings.
<b>Heritage Council</b> <b>SW_RBMP_19</b>	Hopes that local authorities will endeavour to increase their ecological expertise and capacity in order to deliver such a commitment, to ensure their compliance with the Birds and Habitats Directives, and to ensure water quality standards are reached. Contributing resources to the implementation of Local Biodiversity Action Plans (where developed) should also help to deliver on this commitment, as would giving particular cognisance to the importance of conserving wetland areas at the local level and through development control and control of illegal dumping on such sites, to maintain their contribution to water quality management.	In recent years many local authorities have broadened the range of professional staff employed by them, in particular in the environmental and natural heritage area, such as ecologists, biologists, agricultural scientists, heritage and biodiversity officers. However, this is not the case in all local authorities.
<b>Central Fisheries Board</b> <b>SW_RBMP_25</b>	<p>The adoption of program of measures that are focused on a single species and that fail to take into account the complexity and interaction with other species are more likely to fail. In this respect, pearl mussel management plans in the absence of salmon management plans fall into this category.</p> <p>Until scientific research indicates otherwise, equal weighting, in terms of sensitivity should be afforded to early life stages of</p>	These comments have been noted and forwarded to the DEHLG

Organisation	Prot High Q Areas (FWPM)	RESPONSES
	salmonids and early life stages of the pearl mussel.	
<b>Waterford IFA</b> <b>SW_RBMP_28</b> <b>IFA</b> <b>SW_RBMP_43</b> <b>IFA</b> <b>SW_RBMP_04</b>	IFA proposes that additional measures must not be imposed on the farming community until the reasons for FPM failing to reproduce are identified. IFA proposes that detailed research is conducted to evaluate the social, economic and environmental cost of implementing the land sterilisation measures proposed, in advance of their implementation.	This comment has been forwarded to DEHLG for consideration during FPM Sub basin plan preparation
<b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b>	Positive Role of FPM is not recognized or highlighted. Clear felling continues in FPM catchments despite moratorium issued by DOA. Lack of enforcement by competent authorities is questioned in future order to achieve WFD objectives.	This comment has been forwarded to DEHLG for consideration during FPM Sub basin plan preparation
<b>EPA</b> <b>SW_RBMP_41</b>	Reference to RBD specific FWPM plans must be used.	Specific reference to the FPM is used throughout the plan under the Birds and Habitats Directives.

#### 4.12. Cruising, Boating & Receptions

Organisation	Cruising & Boating and Recreation	RESPONSES
<b>Cork County Council</b> <b>SW_RBMP_17</b>	Bathing Waters: In West Cork there is a large amount of leisure marine activity but very few designated bathing areas surely this must be taken into account in designing sewage schemes and discharges.	The Urban Waste Water Treatment Regulations, 2001 is the principal legal instrument that prescribes requirements in relation to the provision of treatment standards for urban waste water treatment plants. The regulations state that 'more stringent requirements than those specified in Parts 1 and 2 of the Second Schedule shall be applied to discharges from a treatment plant where this is required to ensure that the receiving waters satisfy any other relevant Community Directives'. i.e. where the treatment plant is to discharge to a designated bathing area appropriate standards may be applied that may be more stringent than those prescribed in the Regulations. The Waste Water Discharge (Authorisation) Regulations 2007 also play a role in the control of discharges from waste water treatment plants to bathing waters. The Regulations prescribe that 'the Agency shall not grant an authorisation for a waste water discharge which, in the opinion of the Agency, is inconsistent with the achievement of environmental quality standards established under national Regulations in relation to designated bathing waters'. The identification of bathing waters is the remit of the Local Authorities in accordance with Article 4 of the Bathing Water Quality Regulations 2008.
<b>Faite Ireland</b> <b>SW_RBMP_31</b>	Prioritisation of water quality improvements to waters of high recreational and amenity value	Such designated waters are included in the register of protected areas and objectives assigned accordingly.

Organisation	Cruising & Boating and Recreation	RESPONSES
<b>Dept. Communications, Energy &amp; Natural Resources, SW_RBMP_34</b>	An equivalent supplementary measure to ‘enforcing pump out controls and speed restriction at district level’ may need to apply to coastal/Ports/Bay water bodies and lead authorities should be a combination of Local Authorities/Port Authority/Dept of Transport	This comment has been noted
<b>SWAN SW_RBMP_38</b>	The role of boat users in the transference of alien species must be addressed.	The NPWS and the Environment and Heritage Service in Northern Ireland jointly commissioned the ‘Invasive Species in Ireland Project’ in 2006. Management and contingency plans have been produced for the most high risk species. Awareness raising campaigns to all users of water bodies forms a major component of these management and contingency plans which are required to prevent the spread of non-native invasive species. Suggestion forwarded to the NPWS who are involved in developing supporting measures through the national alien species study.

#### 4.13. Shared Water Issues

Organisation	Shared Water Issues	RESPONSES
<b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b>	Unacceptable that a single plan has not been produced for the IRBDs instead of the working together document.	The Working Together document sets out the high degree of coordination achieved in all aspects of plan preparation; it, together with the detailed plan summaries for the Northern Ireland and Ireland portions of the district, constitutes a single plan. The detailed summaries allow for the current differences in legislative controls and adoption process requirements. Further harmonisation of measures will be achieved through implementation of the river basin management plans and the ongoing coordination via the North South Technical Advisory Group.
<b>An Taisce</b> <b>SW_RBMP_33</b>	Experience of the existing operation of Local Authorities and other government agencies does not provide evidence that joined-up thinking (and action) is deliverable within these organisations. Separate budgets exacerbate the lack of communication between agencies in delivering objectives under WFD.	This has been addressed as an action item within the plans, and DEHLG has established a high level WFD implementation group with representatives from relevant authorities and agencies.
<b>Waterways Ireland</b> <b>SW_RBMP_44</b>	Waterways Ireland will continue to develop and enforce bye-laws on all its navigations incorporating the principals of the WFD particularly with regard to speed restrictions and the management of pump out facilities where appropriate. Waterways Ireland has extensive knowledge and experience in waterways management and will continue, in consultation with relevant environmental authorities, to invest in and develop the best management practice, new techniques, tools and machinery essential for maintaining and managing sustainable navigations both on our canals and river navigations for the benefit of all.	Comment is noted. Waterways Ireland has drafted new Bye-laws for all seven navigations under its jurisdictional remit. These are due to issue for public consultation imminently and will thereafter be subject to change and ratification by the two government departments and the North South Ministerial Council. Comment is noted.

#### 4.14. Public Participation

Organisation	Public Participation	RESPONSES
<b>Kerry Co Co SW_RBMP_13</b>	<p>The timelines involved in the preparation of the draft plan did not allow adequate time for detailed consideration by the local authorities of the content of the document in question prior to its publication on the 22<sup>nd</sup> December, 2008.</p>	<p>The intention of the draft plan is to evoke comment and feedback in order that these may be accounted for in the final plan. County and city councillors were issued notification of the publication of the draft plan on 23rd December 2008. Public consultation on the draft plan commenced in April 2009. The SWIMI report was a precursor to the draft plan which indicated the issues that were to be addressed in the draft plan. Key Local Authority staff members were afforded opportunity to comment on the draft plan prior to its publication through their involvement in project meetings.</p>
	<p>The statement on page one of the document to the effect that the plans in question have been issued by the various County Councils listed therein (including Kerry County Council) is, in our opinion, not accurate according to our view of events. Similarly the statement on page fifty eight of the document that “the outcome of this process is a tailored action plan for the South Western District, a plan that has been proposed by the District’s local authorities” is also not in accordance with our view of events. It is our position that the draft plan in question is not formally being issued or proposed by the various local authorities. In effect, therefore, the document in question does not represent, in its entirety, the views of Kerry County Council.</p>	<p>The comments of Kerry County Council are noted.</p>
<b>Central Fisheries Board SW_RBMP_25</b>	<p>There is a need for all public authorities within each RBD to fully engage with the public and to increase public awareness of the directive, the river basin management plan and the program of measures. Emphasis must be on the promotion of sustainable uses of our waters. There is a need to review the</p>	<p>An awareness programme is included as a measure.</p>

Organisation	Public Participation	RESPONSES
	existing consultation framework as the river basin plans go from adoption to implementation phase.	
<b>South Western Regional Fisheries Board SW_RBMP_21</b>	<p>The Consultation Draft Plan and documents available on the web side are complex and the site is slow to load up and move through, particularly when there is a slow internet connection which makes the procedure arduous and un-user friendly.</p>	<p>The speed at which the site uploads is down to the individual internet connection. All efforts were made to compress documents and images in order that they may be downloaded expeditiously. Hard copy documents were also made available through local authority offices and libraries. The RBD office could also be contacted for hard copy documentation.</p>
	<p>An objective of the WFD Directive is to encourage public participation and interaction, however information has not been provided in terms which easily describe the pressures, the measures and targets to be achieved etc.; To encourage interaction it would be beneficial if the issues relevant to each river catchment could be simply described, what measures are to be taken, by whom, using what means, the targets to be achieved and within what time frames. An interim review should also be made available with details of progress made.</p>	<p>There has been an extensive programme of public involvement in the process of drafting the RBMP. Both the SWMI document and the draft plan have been purposely written using non-technical terms in order that it is user-friendly to the general public. The sections of the draft plan addressing the measures clearly set out the measures that need to be taken, the responsible body and the timeframe. Progress on the implementation of the plan will be reported to Europe in March 2010. The European Commission then release an implementation report for Europe.</p>
	<p>Involvement of Stakeholders could be improved by the inclusion of recreational and local community groups etc, e.g. Lee Valley Eco Group with dissemination of information through newsletters, web site updates etc, this could be facilitated through setting up of Specific Catchment Management Plan Groups.</p>	<p>An Advisory Council is established in each RBD, membership of which is open to any member/group and is publicly advertised. Literature was produced as required and made freely available through the network of local authority offices and libraries, and other public authorities and no-line. A website was</p>

Organisation	Public Participation	RESPONSES
		set up for each RBD and is regularly updated.
<b>IFA</b> <b>SW_RBMP_04</b> <b>Waterford</b> <b>IFA</b> <b>SW_RBMP_28</b>	IFA is represented on each of the River Basin District Advisory Councils and are active participants on the South Western River Basin District (SWRBD).	This comment has been noted
<b>Irish Wildlife</b> <b>Trust</b> <b>SW_RBMP_29</b>	Education is important to provide all citizens with a greater focus on preventing problems and actively protecting waters. A wider engagement with the public is needed through schools and other community groups and marketing. Training in Local Authorities also needs to take place.	An awareness programme is included as a measure.
	A Scheme to identify water bodies meeting 'good' or 'high' status should be established.	The WFD monitoring programme includes for such investigative programmes.
	All stakeholders should have access to comprehensive geographical information on locations of threats, pressures and monitoring results.	Access to spatial information relevant to the WFD and plans is facilitated through the WaterMaps web based tool available at <a href="http://www.wfdireland.ie">www.wfdireland.ie</a> . Further development and improvement of this tool is ongoing during finalisation of plans. Information requests will also be facilitated through the River Basin District office and relevant Local Authorities, however access is available via libraries
	No sufficient solution to lack of broadband internet access for the public for Water maps tool.	
<b>SWAN</b> <b>SW_RBMP_38</b>	Set up scheme for local initiatives engaging all relevant stakeholders in water body protection.	Comment noted - the appropriate level and means of engagement need to be considered in the implementation process

Organisation	Public Participation	RESPONSES
	Engage in ongoing dialogue with SWAN regarding our submission and provide us with a further revised copy of the draft Plan indicating where our concerns have been taken on board	This comment has been noted
	A programme for actively encouraging public participation in the implementation of the first planning cycle of the Plan from 2009 to 2015 must be set out in the Plan	An awareness programme is included as a measure.
	Include as a measure to be implemented immediately, a national public awareness campaign on water.	
	The RBD must provide access to information on the Plan (and its supporting/background documentation) to those without broadband Internet connections	Access to Information on foot of requests will be facilitated through the River Basin District office or relevant Local Authorities, however broadband access is also available via libraries.
	The Advisory Councils must be reconstituted in an open and transparent manner.	This comment has been noted

#### 4.15. Economics

Organisation	Economics	RESPONSES
<b>South Tipperary County Council SW_RBMP_07</b>	It is unclear from the RBMP publications how extensively the measures were appraised to assess 1) how costly they would be to implement 2) whether or not they are cost effective, and 3) if they can be achieved within the required timeframe.	Costing of wastewater and on-site system measures has been undertaken for all water management units. The plan clarifies the recent proposals on water pricing policy and also confirms that economic analysis has not been used to extend deadlines for the final plan. The resourcing of plan implementation is being considered by the relevant authorities who will produce implementation programmes.
<b>Kerry Co Co SW_RBMP_13</b>	Full implementation of the measures, which have been proposed in the draft plan would entail considerable expenditure on the part of the local authorities involved.	This comment has been noted and forwarded to the EPA. The resourcing of plan implementation is being considered by the relevant authorities who will produce implementation programmes.
<b>Cork County Council SW_RBMP_17</b>	While the document and its aspirations are very worthwhile unless significant manpower and financial resources are made available to implement the plan and all the measures and legislation it will remain a plan and not reach its objectives. There has been no evidence in the past of these resources being made available and the current economic climate does not instil confidence in their provision in the immediate future in order to achieve the aims of the plan in the timescale envisaged.	Comment noted. The level of ambition of the plan is under review with the aim of extending deadlines for the achievement of the objectives of the WFD. It is hoped that this will to some extent reduce resource pressures. Implementation plans are to be developed by Local Authorities in accordance with the WFD.

Organisation	Economics	RESPONSES
<b>South Western Regional Fisheries Board</b> SW_RBMP_21	Resource Assessment: To provide confidence in the Plan, an economic review of the resources required to achieve the objectives and a realistic determination if these resources will be made available to achieve that end, should be provided.	It is recognised that the balancing of sufficient financial resources to tasks is an on-going challenge for both central and local government. Resource management within individual authorities, in order to implement the requirements of the plan, is the responsibility of each individual authority. Economic analysis has been undertaken and will be included in the plan and includes cost effectiveness analysis.
<b>Irish Wildlife Trust</b> SW_RBMP_29	The absence of adequate economic analysis in the plan means it is impossible to cost and prioritise necessary actions in the Plan. Cost effective analysis for supplementary measures is recommended. Financial implications of the following need to be considered as cut backs are imminent due to current economic climate: Monitoring, Infrastructure, Enforcement, Presently provided basic measures.	Costing of wastewater and on-site system measures has been undertaken for all water management units.
<b>Independent Farmers' Federation</b> SW_RBMP_30	Request for local elected representatives to give particular attention to the scale of costs for the provision of water services to farms and small rural businesses.	This comment has been noted.
<b>Waterford Co Co</b> SW_RBMP_32	Clarification of funding source for both basic and supplementary measures is required  There is a major difficulty in presenting a plan to the local elected members for adoption if the funding mechanisms are not adequately dealt with.	Substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive  Comment noted.
<b>An Taisce</b> SW_RBMP_33	Information regarding proposed budgets is deficient. The Draft Plan appears to have been drafted in the absence of any economic analysis. Any economic information has only been made available in the background documents. The Draft Plan needs to carry out an ecological cost benefit analysis as required by Article 5 of the WFD and include it within the Plan, not the background documents.	Costing of wastewater and on-site system measures has been undertaken for all water management units. The plan clarifies the recent proposals on water pricing policy and also confirms that economic analysis has not been used to extend deadlines for the plan. The resourcing of plan

Organisation	Economics	RESPONSES
	<p>There are serious economic implications for business associated with inadequate water supply and/or quality, an issue which has not been addressed within the Draft Plan.</p> <p>Water pricing is mentioned in the Draft Plan as ‘Member States needing to adopt a cost recovery system to ensure that water pricing policies act as incentives towards efficient water usage’. There is no further description as to what the water pricing policies would entail</p> <p>The Draft Plan has not addressed the issue as to where the resources, such as funding and personnel, will come from to ensure the Plan is delivered and implemented.</p>	<p>implementation is being considered by the relevant authorities who will produce implementation programmes.</p>
<p><b>SWAN</b> <b>SW_RBMP_38</b></p>	<p>The RBD Management Plans must provide a summary of the economic analysis that has informed the Plans. This is mandatory under Article 13 of the Directive</p> <p>The Plan must specifically require transparent decision-making, with regard to DCA, lead by fully qualified personnel and in consultation with the public and must include a specific directive that alternative objectives cannot be applied based on affordability criteria alone.</p> <p>The Plans must clearly outline the legal situation regarding domestic water charges and propose water charging as the best mechanism for promoting sustainable water use. It should propose an independent review of the issue and the possible charging options, taking into account social justice issues, with full public participation, water charging</p>	<p>Costing of wastewater and on-site system measures has been undertaken for all water management units.</p> <p>This has been included as a measure</p>
<p><b>EPA</b> <b>SW_RBMP_41</b></p>	<p>Clarification of Disproportionate cost test and status of various economic tests on supplementary measures.</p>	<p>Costing of wastewater and on-site system measures has been undertaken for all water management units. Economic analysis has not been used to extend deadlines for the plan.</p>

#### 4.16. Climate Change

Organisation	Climate Change	RESPONSES
<b>Heritage Council</b> <b>SW_RBMP_19</b>	<p>Recently completed a review of the potential impacts of climate change on the heritage and tourism of Ireland's inland waterways and coasts. This may be of assistance in the climate proofing of the plan. It is available from <a href="http://www.heritagecouncil.ie">www.heritagecouncil.ie</a></p> <p>Urge that action be taken to educate the general public about the value of water generally, and that specific audiences are targeted on specific issues such as the location of septic tanks, the sinking of wells, discharges into water, the importance of wetland sites for water</p> <p>Hopes that sufficient human and financial resources are allocated to additional measures to ensure active involvement of the public in the plan implementation in the long term.</p>	Comments have been noted. The recommendations are considered when developing the various information and awareness campaigns recommended as part of the suite of mitigation measures which are also included in the SEA environmental report.
<b>Central Fisheries Board</b> <b>SW_RBMP_25</b>	<p>Rational management and wise use of resources needs to be implemented. The plan should be proofed against climate change with more emphasis given to impacts and adaptation.</p> <p>It is proposed that a SEA be undertaken to assess the wider environmental impacts of the European Union recommendations including climate change issues. There should be specific fisheries related assessments.</p>	<p>An update on climate change has been included in the plan</p> <p>An SEA has been ongoing in parallel with the SWMI, draft and final plans</p>
<b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b>	<p>Climate change and sea level rise need to be addressed by the plans.</p> <p>Reduction in rainfall and higher temperatures leading to eutrophication also need to be considered.</p> <p>Local Authority Development Plans must include actions or proposals for climate change.</p>	<p>These comments have been noted.</p> <p>An update on climate change has been included in the plan.</p>
<b>Failte Ireland</b> <b>SW_RBMP_31</b>	Consideration within the plan to the issue of climate change	An update on climate change has been included in the plan
<b>An Taisce</b> <b>SW_RBMP_33</b>	<p>The flood risks associated with resulting rises in sea levels are being dealt with in the Flood Management Plan currently being drawn up. This issue is noted, but not adequately addressed in the Draft Plan. Closer integration of the two Plans, using approaches that deliver objectives under both, is necessary.</p> <p>Climate change dealt with in a reactive manner instead of proposing pro-active strategies to increase resilience of ecosystems, for example wetlands, and societies. There is a failure to identify and promote the functions of wetlands, for example in controlling pollution and flooding.</p>	<p>An update on climate change has been included in the plan</p> <p>Wetlands are included as a measure under the morphology issue.</p>

<b>Organisation</b>	<b>Climate Change</b>	<b>RESPONSES</b>
<b>SWAN</b> <b>SW_RBMP_38</b>	The plan should give a more detailed treatment of climate change similar to that in the NI draft Plans, including an outline of the implications of climate change for the aquatic environment and a summary of measures for each SWMI, to address these implications.	An update on climate change has been included in the plan
<b>EPA</b> <b>SW_RBMP_41</b>	Provide specific measure on how RBD will incorporate adaptation measures against climate change.	An update on climate change has been included in the plan

#### 4.17. Implementation

Organisation	Implementation	RESPONSE
<b>Department of Agriculture, Fisheries &amp; Food</b> SW_RBMP_01	It should be noted also that the control carried out by DAFF in relation to Statutory Management Requirement 3 (protection of the environment and soil when sewage sludge is used in agriculture) is limited to Cross-compliance checks under the Single Payment Scheme. The implementing authorities for the purposes of the national legislation on use of sewage sludge are the local authorities.	This comment has been noted
<b>BirdWatch Ireland</b> SW_RBMP_02	Concerned of the lack of defined appropriate timescales and targets for actions.	Objectives have been established in the plan for all waters. Implementation programmes are to be developed by relevant authorities.
	Concerned of the lack of actions to buffer water bodies and wetlands in planning decision-making processes	Planning process addressed under the links to plans and programmes section. Risk analysis approach espoused in the plans provides valuable decision support framework to planning authorities.
<b>BirdWatch Ireland</b> SW_RBMP_02	Concerned of the lack of data to inform the biological value and condition of water bodies and associated habitats (wetlands in particular) and species, and the lack of mapping of such habitats outside the boundaries of designated sites.	Comment noted and forwarded to the EPA/NPWS
<b>Mills and Millers of Ireland</b> SW_RBMP_05	Mills are frequently close to situations that are subject to slurry and agricultural contaminations; our members could engage in regular monitoring activity that might benefit both mill owner and the community.	Offer of monitoring programme support - comment forwarded to EPA
<b>Teagasc</b> SW_RBMP_09	Concern regarding approach and methodology used to define standards for nutrient concentrations in receiving waterbodies and about the calibration of these standards against ecological water quality classes (Q-values).	Nutrient standards have been defined by examination of an extensive historic database of chemical and biological water quality data to minimise the likelihood of potential mismatch in ecological status.
	Concern that by continuing with the current, national river monitoring programmes for nutrient status in rivers and using these as standards for Programmes of Measures (PoMs), this will	

Organisation	Implementation	RESPONSE
	<p>not be sufficient for ensuring that the consequences of agricultural mitigation of diffuse nutrient transfer has been captured.</p> <p>Proposed low molybdate-reactive P (MRP) standard of 30 µg L-1 for rivers in Ireland conflicts with the standards set in Scotland, a country with similar hydrology and hydrogeology to Ireland. In Scotland, the proposed standards for riverine Soluble Reactive P (SRP) for good status is set at 50 µg L-1 for lowland rivers, 40 µg L-1 for highland rivers and 120 µg L-1 for rivers with high alkalinity (&gt;50 mg L-1 CaCO3)</p> <p>Concerned at reviews of PoMs based on current ecological assessments and chemical monitoring that indicate a low ecological status or poor recovery in agricultural catchments without regard for the links between ambient (not episodic) riverine nutrient concentrations, their causes and the uncertainty of ecological consequences.</p> <p>Agricultural Catchment programme commenced in 2008 will feed into the 2<sup>nd</sup> review of the SI 378 (2006) and SI 101 (2009).</p> <p>Until publication of results of Agricultural Catchments Programme, there will be a lack of scientific evidence to support the view that measures adopted under the SI 378 and 101 (2009) would be insufficient to reach the targets of the WFD.</p>	<p>UK nutrient standards have been set as face-value maxima which cannot be exceeded. Irish standards have been defined using 95%ile approach and provide a greater measure of protection by ensuring discharges are set at meeting an ecologically realistic target rather than a maximum value.</p> <p>The plan acknowledges that the agricultural catchment programme will determine the requirement for measures for agriculture however such measures are included in appropriate circumstances in the FPM sub basin plans</p>
<p><b>ESB</b> <b>SW_RBMP_10</b></p>	<p>Nothing should be considered, either during investigation or implementation phases of the River Basin Management Plan, which could have an adverse effect on the safety of any of ESB's dams or embankments.</p>	<p>This comment has been noted</p>
<p><b>Central Fisheries Board</b> <b>SW_RBMP_25</b></p>	<p>Necessary to continue to undertake the necessary surveys in order assign a typology classification to all lakes within the RBD.</p>	<p>Comment noted and forwarded to the EPA</p>

Organisation	Implementation	RESPONSE
<b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b>	Sampling methodology needs to be transparent so validity can be assessed.	Final classification will be assigned by the EPA in 2011 in accordance with the recent surface water regulations.
	Sampling in middle of lakes is inappropriate as most dilution occurs here. Most serious problems of pollution are not addressed or identified as this is where most dilution occurs	Sampling has been undertaken in accordance with CEN/ISO standards as required by WFD. Mid lake sampling for Surveillance monitoring is used to define the overall status of the water body. Investigation of localised pollution is the subject of Operational or Investigative monitoring. The Irish monitoring program is one of the most intense in the EU in terms of number of monitoring sites per 100km <sup>2</sup> . These have been chosen to be representative of the range of rivers / lake typology, quality and pressures.
	Lack of info on monitoring sites. Reasons for these locations, nature of monitoring and monitoring results. Concern over possible shortcomings and opposite effect to informing the public and encouraging them to support and assist in achieving the WFD objectives.	
	Provisions for alterations mid plan based on new knowledge of water body classification should be allowed for within the plan.	
<b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b>	Lack of independent technical expertise to assess documents produced are valid and correct. Third part assistance is required to assess consultants outputs.	All background information has been made available and information/meeting requests will be facilitated.
<b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b>	Central authority required with power and resources to enforce controls.	This comment has been noted
	Enforcement is not given adequate attention in the plan	Enforcement is considered as an ongoing action item throughout the SWMI, draft plan and final plans
<b>An Taisce</b> <b>SW_RBMP_33</b>	There is a lack of existing legislative enforcement that means there is widespread cynicism regarding the ability to deliver objectives of the various EU Directives, or other legislative measures, before supplementary measures are even considered for introduction. This does not suggest that further supplementary measures are any more likely to be enforced.	These comments have been noted. The need for full enforcement of basic measures is accepted and emphasised in the plan.
	The local authorities do not have the staff to “enforce” the Nitrates Directive therefore the education approach could be the most effective.	
<b>An Taisce</b> <b>SW_RBMP_33</b>	Water body classification is inadequate. The objectives set for each water body and the measures proposed to reach this are all based on the current status of the water body.	Comments noted and forwarded to the EPA. Investigative measures to confirm status and pressures are recommended in the plan. Parameters measured in

Organisation	Implementation	RESPONSE
	<p>A large portion of the waters within the South Western RBM Plan have not had each of the different statuses established yet. 44% of coastal waters still need their surface ecological status to be determined, while 77% of rivers and canals, 96% coastal waters and 100% of estuaries and Lakes &amp; Reservoirs still need their surface chemical status determined. With such a vast amount of data still missing, how is it possible for the Draft Plan to state that a 100% of Lakes &amp; Reservoirs, Estuaries and Coastal waters will achieve their objectives by 2015?</p> <p>Within the Plan an account of which parameters are measured should be given. This allows for an understanding on how each ecological and chemical status of a specific water body is labelled.</p> <p>There is a wider need to highlight the link between good ecological status and morphological status, to illustrate the need to consider issues in a broader sense of ecosystems and habitats.</p> <p>Due to the nature of how the Draft Plan has been drawn up, it is difficult to ascertain whether the cumulative effects on water bodies have been adequately addressed.</p> <p>No analysis has been carried out on the substrate of riverbeds, mudflats and coastal zone substrate. This is an important area to analysis, as were intermittent pollution may be missed in regular monitoring, accumulation within the sediment would be indicative of such events.</p> <p>The locations of waste water outflows should be made publicly available and accessible for those whom may be of relevance and interest to. Monitoring point information is also needed to assess the validity of these, and the implications of this for interpretation of data generated, relevant for example to waste water treatment discharges.</p> <p>There was no consultation as to the location of the monitoring sites, yet these should be justified</p> <p>Sampling methodology needs to be transparent so that its validity</p>	<p>assigning status are tabulated in the plans. Pilot studies on chemical pollution undertook analysis of sediment and biota to detect substances that may not have been present in the water column. There was a consultation on the monitoring programme (which forms a background document to the plan) in 2006. The monitoring programme explains all the surveys for status elements including those targeted to detect dangerous substance discharges. The updated Watermaps tool will contain more explanation of status.</p> <p>The locations of IPPC and wastewater discharges are available from the EPA website using the Envision GIS tool.</p> <p>Monitoring sites were selected to be representative of typology, quality and pressures and were determined following input from a wide range of public bodies via the National Technical Coordination Group.</p>

Organisation	Implementation	RESPONSE
	<p>can be assessed.</p> <p>There is a vast amount of data not given, which needs to be presented and interrogated, in order to allow concerned parties to assess the quality of the Draft Plan.</p> <p>Much of the modelling that is represented to the reader in the Plan requires an acceptance that all the data used is valid and correct, without any real ability to interrogate it.</p> <p>The secondary effects of failure to implement measures are not addressed within the Draft Plan.</p> <p>No explanation of the data is available on the watermaps website, or anything regarding assumptions of assimilative capacity of coastal waters, which remain unclassified but are unlikely to be maintained or restored to good status if relied upon to absorb polluted water.</p>	<p>Sampling has been undertaken in accordance with CEN / ISO standards are required by WFD</p>
<p><b>SWAN</b> <b>SW_RBMP_38</b></p>	<p>The RBDMP must provide full information on monitoring sites and frequencies, and ensure that waters receiving municipal wastewater treatment discharges are continuously monitored</p> <p>The plans must explain how the performance of authorities responsible for these other Directives will be held accountable, and how improved performance will be secured.</p>	<p>The RBMP does include links to the WFD monitoring programme. The comment has been forwarded to the EPA who is responsible for the monitoring programme.</p> <p>Compliance assessments are carried out by the EPA and other agencies</p>
<p><b>SWAN</b> <b>SW_RBMP_38</b></p>	<p>For all waterbodies in the RBD classified as less than good (or otherwise failing objectives) the quality elements that: <b>a)</b> were measured (as listed in Annex V of the WFD) <b>b)</b> were not measured and the reason why and <b>c)</b> were responsible for the failure, must be shown in table form</p> <p>The EPA must make data on all sampling sites and frequencies, available in GIS form and be open to dialogue on queries regarding the monitoring sites. The EPA must investigate and establish the most appropriate system of trained volunteer testing for water bodies where monitoring is not presently conducted. The EPA must seek to access other existing robust data sources on</p>	<p>Such classification information has been tabulated in the water management unit action plans included in the plan</p> <p>Biological results are already available on the EPAs Envision GIS tool. Chemical data will follow shortly. Small Streams Risk Assessment training is available via the Water Services Training Group and a number of consultancies.</p>

Organisation	Implementation	RESPONSE
	water bodies where they hold no data at present, and that are not included in the present monitoring programme	
	The RBD Management Plans (and <a href="http://www.wfdireland.ie">www.wfdireland.ie</a> website) must provide accurate mapped data on known discharges to water, including all licensed discharges and other known pollution sources and related information.	Additional information and explanatory text has been included in the updated Watermaps tool
	Detailed legends explaining all terms, the presence or absence of all categories (or risk, measure, etc.), the meaning of classifications (“good” and “poor”, etc.) must be included in the <a href="http://watermaps.wfdireland.ie">http://watermaps.wfdireland.ie</a> website.	
<b>EPA SW_RBMP_41</b>	SW Ecological Status - Biology Classification Systems. Should state that classification tools not yet been developed for a number of biological elements and that once available they will be integrated into the biological classification system.	This has been included in the plan
	Overview Diagram indicating elements contributing to Ecological and Chemical Status.	This has been included in the plan

#### 4.18. Additional Issues

Organisation	Additional Issues	RESPONSES
SWAN SW_RBMP_38	The Plan must include a measure to reduce trends to creation of increased impermeable surfaces in developments. It must also address the inadequate use of swales (under SUDS), as a requirement in new road development.	SUDS are included in the plan as a measure
GSI SW_RBMP_37	Consideration might be given to the development of response matrices for roads, similar to existing response matrices for landfills developed by the Environmental Protection Agency (EPA) and the GSI. The National Roads Authority (NRA) is currently funding a research project on “Analysis and development of road drainage systems for different geological environments in Ireland.	When this research information becomes available then that will be considered in further updates of the plan
SWAN SW_RBMP_38	<p>The negative impacts and risks posed by so-called "land reclamation", i.e. infilling of low-lying ground/wetlands is not addressed. The Land Drainage Act must be revoked to remove the incentive for such drainage</p> <p>Floodplain restoration should be proposed as a measure.</p> <p>The complimentary use of reed beds for wastewater ‘polishing’ should be proposed and their wider use researched</p>	Such initiatives are included as measures in the plan
BirdWatch Ireland SW_RBMP_02	Concerned of the lack of emphasis on protection of wetlands.	Designated sites are included as protected areas and objectives set accordingly
Central Fisheries Board	Concerned of the lack of emphasis on protection of wetlands.	Designated sites are included as protected areas and objectives set accordingly
SW_RBMP_25	<p>Concerned of the lack of actions to buffer water bodies and wetlands in planning decision-making processes</p> <p>No reference to Integrated Constructed Wetlands (ICWs) in the Draft Plan. Propose that ICWs be included as a measure in the Draft Plan. Such systems should be designed by engineers and scientists and installed and operated under their supervision. A Guidance document for their siting, construction and installation is currently being compiled by the Integrated Constructed Wetlands Steering Group and Scientific Committee under the auspices of the Department of Environment Heritage and Local Government, as currently there is a lack of agreed design criteria for these systems. These systems should also be subject to the planning process and a strategic environmental survey must be a prerequisite of</p>	<p>Controls fall under the existing planning and development control process</p> <p>Additional levels of treatment have been considered as measures in the plan for WW Discharges where appropriate.</p>

Organisation	Additional Issues	RESPONSES
	the planning process. Final discharge quality must comply with an effluent discharge licence. As regards plant species, only native species from native stock should be used.	
<b>Waterford IFA</b> <b>SW_RBMP_28</b> <b>IFA</b> <b>SW_RBMP_43</b> <b>IFA</b> <b>SW_RBMP_04</b>	IFA propose the establishment of an environmental works programme for each of the rivers in the SWRBD to increase river capacity by tree cutting and vegetation growth control.	Comments noted and forwarded to OPW for consideration under Floods Directive Management Plans
<b>Waterford IFA</b> <b>SW_RBMP_28</b> <b>IFA</b> <b>SW_RBMP_43</b> <b>IFA</b> <b>SW_RBMP_04</b>	<p>IFA propose the establishment of an environmental works programme for each of the rivers in the SWRBD to increase river capacity by tree cutting and vegetation growth control and to remove silt in critical areas.</p> <p>IFA propose the establishment of a national river maintenance budget to protect wildlife such as the corncrake, the regeneration of the freshwater pearl mussel and the livelihoods of the thousands of farm families who loose crops annually due to flooding.</p>	
<b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b>	<p>The benefits of wetland functions are not recognised in the draft Plan and proposed measures to protect them are either missing or inadequate.</p> <p>Waste water treatment plants should be set back from water bodies to allow for additional use of reedbeds that can polish water and to act as a safety valve to handle variable waste flows. A positive attitude to reed bed systems is needed amongst local authorities, planners and environment staff.</p> <p>No elaboration in draft plans of how the Plans will be integrated with the Floods Directive</p>	<p>Designated sites are included as protected areas and objectives set accordingly</p> <p>Additional levels of treatment for have been considered as measures in the plan for WW Discharges where appropriate</p> <p>This is addressed under the links to plans and programme section of the plan</p>
<b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b>	There is insufficient licensing and enforcement of peat extraction and peat extraction is not adequately addressed in the draft plan.	Peat extraction has not been identified as a significant water management issue in the SWRBD, however the plan includes existing controls to address this pressure.

Organisation	Additional Issues	RESPONSES
SWAN SW_RBMP_38	The issue of windfarms is not addressed in the Draft Plan.	Wind farms fall under the existing planning and development control process and these will be informed and supported by the risk based approach being taken in developing the plans
Irish Wildlife Trust SW_RBMP_29	Construction of windfarms is a problem for siltation of waterbodies. This issue is not adequately addressed in the draft plan. Windfarm construction in sensitive upland areas like upland blanket bogs causing massive negative impacts on the hydrology of the drainage system.	Wind farms fall under the existing planning and development control process and these will be informed and supported by the risk based approach being taken in developing the plans.
SWAN SW_RBMP_38	The monitoring programme for coastal waterbodies must be implemented immediately if Ireland is to be in compliance with Article 8 of the Directive. The Plan must then be amended, mid cycle if necessary to take account of the resulting classification.	Implementation of monitoring is ongoing the final classification of status will be completed in 2011 in accordance with the recently introduced surface water regulations
	The National Integrated Coastal Zone Management strategy in draft form for years, must be reviewed with public consultation and implemented	This comment has been noted
Irish Wildlife Trust SW_RBMP_29	No mention of coastal zone management in the draft Plan which will be required to address the challenges for good ecological status.	ICZM is included as a measure in the plan.
	No modifications along the coasts are identified in the Draft Plans. This information is held by the OPW.	Coastal modifications, including harbours, embankments, armouring etc. were considered in the morphology assessment
	Shipping issues are not addressed like oil spills, tanker groundings etc.	Existing control measures are included in the plan under the basic measures.
SWAN SW_RBMP_38	Detailed information on the nature and location of ground waters, recharge rates, specific point source discharge licenses to them and other known information must be made available.	These have been considered in the risk assessment process.

Organisation	Additional Issues	RESPONSES
<b>Teagasc</b> <b>SW_RBMP_09</b>	Groundwater waterbodies should be considered under the heading of extended deadlines also	Extended deadlines have been considered for some groundwaters (mainly related to mine impacts)
<b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b>	Attention to ground water is significantly less than give to surface waters.	All groundwater requirements have been addressed in the plan (status objectives and measures)
<b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b>	Turloughs need to be considered and addressed as one of most unique habitats and rare on a European Level.	Turloughs are considered amongst the groundwater dependant habitats
<b>GSI</b> <b>SW_RBMP_37</b>	<p>There is less awareness of groundwater as a pathway for contamination and of groundwater supporting surface water flows, than groundwater as a body of water that can be at risk of contamination or over-abstraction.</p> <p>Groundwater is a receptor in its own right, and is also a pathway for contamination to travel to surface water ecosystems. As such, a greater consideration of discharge to groundwater is needed than exists at present. Several suggestions are made</p> <p>Geothermal energy exploitation is not addressed in the Draft RBMP.</p>	<p>This comment has been noted</p> <p>Transfers between groundwater and SW has been taken into consideration</p> <p>This has not been identified as a significant issue to date.</p>

#### 4.19. Measures

Organisation	Measures	RESPONSE
<b>SWAN</b> <b>SW_RBMP_38</b>	Clarify the timing for the introduction of all Measures and the reason(s) for this.	Measures will be applied on a waterbody by waterbody basis as required. Timing is dependent on technical feasibility (for example whether additional information is required) as well as cost effectiveness analysis. Additional details on timing of implementation will be available following compilation of the implementation programmes for the Districts.
	Concerned to read that, in relation to Protected Areas, even after the implementation of the current Water Services Investment Programme, 173 water bodies containing protected areas will still be at risk from point source discharges. This is inconsistent with the statement that basic measures will secure good status for all Protected Areas by 2015.	The current WSIP focuses on UWWTD requirements, further requirements are considered under the WFD for protected waters and other waters
	All measures listed are to be supported and are urgently required in many sites, but where and when are they going to be applied? How can the Plan provide an assessment of what measures will achieve when the measures themselves have not been selected?	Measures will be applied on a waterbody by waterbody basis as required. Timing is dependent on technical feasibility (for example whether additional information is required) as well as cost effectiveness analysis. Additional details on timing of implementation will be available following compilation of the implementation programmes for the Districts.
	A list of waterbodies for which alternative objectives are being applied must be provided with justifications according to strict WFD criteria.	This information is included in the plan
<b>EPA</b> <b>SW_RBMP_41</b>	Integration of SEA and HDA recommendations: Indicate in final report how mitigation measures, which were identified in ER and HDAR, were integrated into the POM. (	A summary table has been provided in the Plan linking the measures to the likely significant environmental effects and identified mitigation measures from the SEA and HDA.
	Clarification on whether measures for physical modifications are required only for river waterbodies.	The morphology measures include marine and freshwater measures, however some are only applicable to rivers

Organisation	Measures	RESPONSE
	Unique coding system for measures.	This has been included in the plan
<b>Central Fisheries Board</b> <b>SW_RBMP_25</b>	Baseline surveys should be carried out prior to development which would include fish population monitoring and post development fish monitoring. There should be a systematic review of impacts caused by small hydropower schemes which allow an assessment of the mitigation measures.	This suggestion has been forwarded to the LA and DCENR for consideration during development of these projects
	The OPW should continue to be encouraged to undertake drainage operations sensitively and where practicable to restore the fish habitat in co-operation with the fisheries service and the lead local authority.	This suggestion has been forwarded to the OPW.
	There is a need for a comprehensive survey of barriers in the RBD similar to the assessment of the Risk of Barriers to Fish Migration in the Nore Catchment.	Physical Modifications Measures includes for impassable barriers investigation
	The maintenance of the hydrometric network and the fisheries service is supportive of plans to upgrade the network, use of continuous flow monitoring devices and most importantly, accurately recording of low flows. The optimum ecological flow should be established for key fisheries and flows should be sufficient to sustain fish populations, maintain water quality and meet the requirements of migratory fish.	Comment noted and forwarded to the EPA.
<b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b>	Very few concrete actions/measures are directly proposed in the plan. Few measures beyond legislation already in place are proposed. Enforcement improvements are difficult to identify. Not clear if additional Measures will only be introduced if legal measures don't deliver good status	Additional measures are included where appropriate - this includes investigation of the need and effectiveness of measures.
<b>An Taisce</b> <b>SW_RBMP_33</b>	Many of objectives are unclear and not specific enough Has the Draft Plan avoided setting objectives for waters it has not classified yet or is it indicating that by 2027 not all the waters will meet the WFD objectives?	Objectives have been established for every waterbody in the plan
	The Plan needs to be clearer about what is required to achieve good status for each water body and the cost involved.	Objectives have been established for every waterbody in the plan and the economic analysis is presented

Organisation	Measures	RESPONSE
	The Draft Plan has not addressed each measure as to how it will be carried out, nor has the Draft Plan indicated which individual water body needs which particular measure.	Measures have been identified for each waterbody, implementation plans are to be prepared
	The extent of risk posed by different problems varies by water body, therefore the action taken needs to be tailored to each.	
	For how long the Basic measures will be applied before it is determined that they are insufficient to meet good quality water status and Supplementary measures must be used, has not been indicated within the Draft Plan. This must be considered and discussed in the actual management plan.	Appropriate measures have been identified to address the pressures particular to each waterbody. The programme of measures must be implemented by 2012.
	If no use of supplementary measures is anticipated until 2015, then the Draft Plan is plainly misleading and it is disingenuous at best to invite the public to consider these options without making clear that they will not be carried out before 2015.	
	The Draft Plan also states in Step 6 that several alternative measures may be used for any one issue, yet no analysis has been done within the Draft Plan which weighs up the costs and benefits of the different options, both economic and ecological.	Costing of wastewater and on-site system measures has been undertaken for all water management units. The plan clarifies the recent proposals on water pricing policy and also confirms that economic analysis has not been used to extend deadlines for the final plan.
	Whilst 'strengthened enforcement' is cited as a measure, there is no real indication of how this is going to be achieved. There does not appear to be any monitoring of trends or changes in enforcement, so how will it be determined that 'improved enforcement' is being achieved?	A WFD high level implementation group has been established by the DEHLG
	In relation to agriculture, one of the most significant pressures, no additional measures are proposed, (only possible measures are proposed) until the review of the Good Agricultural Practices (Nitrates) Regulations.	The agricultural catchment programme will determine the requirement for measures, however, specific measures for agriculture are included in the FPM sub basin plans
	Draft Plan does not demonstrate that these measures have been assessed for possible knock-on effects.	The SEA process has addressed this issue
	Water conservation measures are not adequately dealt with and Water Harvesting needs to be addressed within the Draft Plan	These are included as measures for abstractions.

Organisation	Measures	RESPONSE
	The Draft Plan signifies that measures will need to be both technically feasible and ecologically sustainable, but it does not indicate that the measures will be piloted when introduced.	These Measures will be piloted if appropriate.
	Grey water use/ re-use/ recycling is also not addressed.	These are included as measures for abstractions.
	The basic measures listed on page 60 in relation to the birds and Habitats Directives needs to include the DAFF as a lead agency in the listed Actions.	This comment has been noted
<b>Department of Agriculture, Fisheries &amp; Food</b> <b>SW_RBMP_01</b>	Supplementary measures relating to agriculture should not be included in final river basin management plan. Supp measures for agri should only take place on basis of finding of EPA review of EC Good Agri Practice for Protection of Waters and DAFF agricultural catchment programme findings.	The agricultural catchment programme will determine the requirement for additional measures, however, specific measures for agriculture are included in the FPM sub basin plans
	Measures for High Status and Protected Areas - review controls on use and disposal of pesticides including sheep-dip	Measures include for controls of dangerous substances in all waters.
	All RBDs - National forestry measure - reduce pesticide usage	These are included as measures for forestry
	National forestry measure - maintain registers of pesticide use	
	National forestry s measure - develop biological control methods	
	Table 10 – Remediation Measures: It will be vital to identify to the Forest Service, forest owners and the forestry sector generally, the "number of waters" to which remediation measures apply. Likewise it will be important to identify those that the relevant remediation measures are to apply. This echoes the reference above to the need to share data.	The proposed measures were identified by a Working Group comprising experts from Forest Service, Coillte Teoranta, COFORD, NPWS, EPA, Fisheries, Local Authorities, RBD Consultants and International Experts and Academics. The measures identified were supported by research undertaken by UCD and UCC as part of the measures development and establishment of cause and effect. The Working Group recognised that some of the proposed measures would require to be trialled out at a catchment scale to determine their effectiveness. Some further research is being undertaken under the HYDROFOR Project.
	S2. The area unit should be “water body” as distinct from catchment of stream order. Water body is used for risk categorisation and for reporting. Therefore calculating critical loads would seem more relevant if based on Water Body since water bodies are land units that, unlike catchments, consist of more or less homogenous characteristics such as geology, topography and soils etc.	
	S3. It is extremely difficult to ensure that samples are taken under "high flow conditions". The existing practices (i.e. the Protocol for the Determination of the Acid Sensitivity of Surface Waters in the	

Organisation	Measures	RESPONSE
	Context of Afforestation - the acid sensitive protocol) attempts to do that by spreading and specifying the sampling season in 4 months in the period February to May.	
	S4. A definition of peat soil type (or peaty soil) is required. The document does not define peat - peat is not a homogenous entity—some are mineralised through agricultural usage, some are cutover, some are unenclosed and not used for intensive agriculture, some support intensive agriculture, some adjoin water stretches at risk. The soils definition of an Irish peat bog is a peat layer >30cm on drained peats and > 45cm on undrained peats (Hammond, 1979) See Teagasc data set.	
	S5. The assumption here seems to be that broadleaves are good and conifers are bad. The type of crop is not the source of potential risk - it is the type of practice.	
	S7. This cell should contain the following text in order to make it more meaningful. <i>“This can be achieved through planned felling. Reforestation should entail riparian zones, mixtures of species where possible, appropriate drainage layouts and more open spaces.”</i>	
	S8. Greater clarity would be achieved by stating the objective of the “auditing”. Suggested text to illustrate an objective may be “Such auditing to identify for example preferred flow paths, opportunities for increasing the retention time of water on site”.	
	S9. The focus should be on ensuring there are no impacts rather than reducing use – there is not a clear correlation between the volume of usage and impact. Water sampling carried out by the Forest and Water studies do not establish any chemicals from forests in the receiving waters.	
	S.11 Please note: End-users of plant protection products for professional use are already legally required to maintain records of use in accordance with the requirements of S.I. No. 381 of 2006 [European Communities (Authorization, Placing on the Market, Use and Control of Plant Protection Products) (Amendment) (No. 4)	

Organisation	Measures	RESPONSE
	Regulations, 2006]. Details must be kept for each product of the brand name, the PCS number, the date(s) of application, the crop and area treated, and the quantity applied.	
	S13. Application of basic material to counteract the acidification processes is not practical due to access difficulties. It poses the risk that if carried it out could generate large volumes of mobile sediment due to soil disturbance, not to mention pulses of basic inputs that could impact negatively on downstream fauna	
	Supplementary Measures Point And Diffuse Sources: Forestry. Pages 101 and 102. Mention is made of "Prioritised Sites" in this Section. These need to be defined or clarified in the Plan - it is assumed that these are the areas (e.g. "Water Bodies") that may impact on the "number of waters" mentioned in relation to Table 10. This should be clarified in the Plan.	
<b>ESB SW_RBMP_10</b>	Due to the complex and interrelated operations of the dams on the River Erne, ESB requests that it would be given an opportunity to participate in these studies.	This comment has been noted
	At the three locations on the Rivers Erne and Clady, the power plants and dams have multiple roles. As well as routine electricity generation, these roles can include water level control, flood control, public safety, dam safety, future water supply, recreation, management of fisheries, rapid response to electricity system demands, black-start capability, etc. These multiple roles often place restrictions on the operation of the reservoirs and discharges to the river downstream. They all need to be taken into account in relation to the investigation or implementation of measures for the relevant waterbodies.	This comment has been noted
<b>Central Fisheries Board SW_RBMP_25</b>	While it is noted that hydromorphology and hydrology are classed under supplementary measures, this should not preclude small scale initiatives in relation to flow manipulation, substrate manipulation and riparian zone management, particularly where such initiatives are underpinned by fisheries research.	The regulatory process will consider the scale of schemes and appropriate controls

#### 4.20. Extended Deadlines

Organisation	Extended Deadlines	RESPONSE
<b>EPA</b> <b>SW_RBMP_41</b>	Provide Scientific Reasons for seeking derogations in time scale.	The decision making rationale is included in the plan's background documents
<b>An Taisce</b> <b>SW_RBMP_33</b>	Where derogations from the default WFD objective of Good Ecological Status are applied e.g. the extended deadline until 2027 for rivers and canals waters in the Draft Plan, insufficient information is provided on the justifications for such derogations. Again there is no economic information presented with regard to decisions made on the basis of disproportionate cost.	The decision making rationale is included in the background documents. Costing of wastewater and on-site system measures has been undertaken for all water management units. The plan confirms that economic analysis has not been used to extend deadlines for the plan.

#### 4.21. Integration with other Plans and Programmes

Organisation	Integration with other Plans and Programmes	RESPONSES
<b>Port of Cork</b> <b>SW_RBMP_08</b>	Port of Cork Company would like the following plans and projects recognised by the final SWRBMP for the period 2009 – 2015. - New Container and Multi-purpose Terminal in the Lower Harbour - New Bulk Facilities in the Lower Harbour as replacement to those which will be lost at City Quays and Tivoli - 5-year Maintenance Dredging Plan (2008 – 2013) - Potential expansion of Cobh Cruise Terminal facilities - Marine Aggregate Extraction (subject to Statutory licensing approval procedures) The above projects do not represent all projects/plans to be executed by Port of Cork within the next 6 years.	The RBMP includes a list of all proposed physical modifications or sustainable developments. Public Bodies have been contacted by the RBD in order to identify all future physical modifications or sustainable developments likely to take place in this plan cycle. The plans/projects will be included on this list.
<b>Central Fisheries Board</b> <b>SW_RBMP_25</b>	The Plan should acknowledge that there is a clear need to develop strategies such as salmon restoration plans that take a holistic approach to issues There is also a need for the river basin management plan to take into account the existence of the eel management plan for each RBD. The Lough Mask Biosecurity Plan is now being implemented in the WRBD and the SWRBD plan should encourage the adoption of similar plans for watercourses in the SWRBD. Coarse fish biosecurity planning should also be encouraged.	These comments have been noted. The Register of Plans and Programmes Background Document to the River Basin Management Plans references eel and salmon legislation and can be viewed on the <a href="http://www.wfdireland.ie">www.wfdireland.ie</a> website under the background RBMP documentation.
<b>Irish Wildlife Trust</b> <b>SW_RBMP_29</b>	Flood Management Plans that are currently being drawn up need to be adequately addressed in the Draft Plan. S.E.A. should be carried out by an independent group and not carried out by consultants involved in drafting the RBD Plans. I will in effect render SEA useless.	These are included in the links to plans and programme section The SEA has been carried out in accordance with statutory requirements

Organisation	Integration with other Plans and Programmes	RESPONSES
<b>An Taisce</b> <b>SW_RBMP_33</b>	Joint administrative arrangements will need to be established to ensure that the same objectives are met in the two jurisdictions and thus helping to secure the delivery of WFD objectives	This is coordinated through the North South Technical Advisory Group
	Other than a brief mention on page 109 of the Draft Plan, there is no elaboration on how the Plan will be integrated with the Floods Directive.	The DEHLG and OPW will progress these mutual implementation issues
	Serious consideration should be given to how effective catchment management/ catchment based flood attenuation fostered through the RBD Management Plan could deliver much of the requirements for the Floods Management Plan.	
<b>Cork Environmental Forum</b> <b>SW_RBMP_35</b>	<ul style="list-style-type: none"> <li>• The Lee Catchment Flood Risk Area Management Study (LeeFRAMS), commissioned by the OPW, is shortly to come up for consultation. This study entailed a lot of climate change research, which is not mirrored in the Draft RBD Plan.</li> <li>• Flooding is a directly related issue. The Plan is poorly articulated with the Floods Directive actions. This lack of co-ordination with clearly related actions raises fears that the Plan (and local authorities) are poorly equipped to deliver this necessary integrated approach.</li> <li>• There is virtually no discussion of climate change and its potential impacts on water quality in the Draft Plan (p. 46). This is a serious omission.</li> </ul>	The importance of co-ordinating the implementation of the Flood Management Plans with the River Basin District Management Plans is recognised in the plan. An update on climate change has been included in the plan.
<b>OPW</b> <b>SW_RBMP_40</b>	It is desirable to coordinate all plans and programmes between the WFD and Floods Directives as far as practicable. OPW envisage that there will be an expanding requirement for all RBDs to coordinate with the OPW to ensure effective and efficient implementation of both Directives for all stakeholders.	These comments have been noted
	Consult with OPW at early stage in the legislative drafting process of the new physical modifications legislation when it commences.	

Organisation	Integration with other Plans and Programmes	RESPONSES
	<p>OPW's Environmental River Enhancement Programme 2008-2012 will be the primary tool for implementation of the relevant measures by OPW. There will be a need to form a national Hydromorphology POM working group to progress national implementation of the measures and deal with aspects such as technical feasibility and disproportionate costs.</p> <p>As Ireland has taken minimalist approach to HWMWBs and OPW are embracing the challenge of achieving good ecological status it is prudent for Ireland to take a flexible approach in this agenda and be in a position to designate or un-designate waterbodies as the plan cycles roll out.</p>	
<b>EPA</b> <b>SW_RBMP_41</b>	Integration of Plan with other Plans and Programmes including County/City Dev Plans s/b mentioned.	Included in links to plans and programmes section of River Basin Management Plans.

## 4.22. Website / WaterMaps

Organisation	Website/WaterMaps	RESPONSE
<b>Southern Regional Fisheries Board</b> SW_RBMP_06	It would also be of benefit to both the stakeholders and general public if a table could be included (possibly as an appendix) describing/showing the reasons for failures in relation to the different waterbodies.  We would suggest an improved explanation of the mapping and coding system to include the rationale behind the different codes for the specific waterbodies.	The reason for the classification of status for each waterbody is identified through the 'WaterMaps' facility. It is intended that this facility will be updated to include further detail.  Comment noted. It is intended that the 'WaterMaps' facility will be updated to include further detail.
<b>Kerry Co Co</b> SW_RBMP_13	It is our belief that the plan is too general in nature and lacks specific detail in relation to the measures that are considered appropriate/necessary at individual catchment level. Notwithstanding the fact that information is available on the “Water Maps” GIS system, this information is again extremely general and does not facilitate identification or analysis of particular water problems at a catchment level.	Measures have now been identified for each waterbody relative to the pressures identified in the catchment. 'WaterMaps' is to be updated to reflect same.
<b>Central Fisheries Board</b> SW_RBMP_25	It is noted that the water maps available on www.wfdireland.ie, though helpful do not show the underlying data upon which they are based. It is important for the fisheries service to know the reasons why a particular water body failed, whether it was due to specific site/sites failure.  It is important that the underlying tabular data be made available to the Inland Fisheries Service and the general public to foster mutual understanding and interpretation of key issues such as assignment of ecological status of waters.  Ideally all reference (national reference sites and references for each biological element) and high status sites within each RBD should be identified on the water maps.  The results of SM monitoring for fish in rivers, lakes and transitional waters is published on the website www.wfdfish.ie. It is envisaged that this website will also have a web-based interactive mapping system (in 2009) to show fish status in all RBDs.	These comments have been noted. Watermaps has been updated however the EPA is the source of the classification data. The detail of parameters used in classification is being included in tabular form in water management unit action plans in the plans.

Organisation	Website/WaterMaps	RESPONSE
<b>Irish Wildlife Trust</b> SW_RBMP_29	Background documents are not cited specifically in the plan and are difficult to locate on wfd website: www.wfdireland.ie	This comment has been noted. The plan contains more detailed linkages to background documents
<b>Dept. Communications, Energy &amp; Natural Resources,</b> SW_RBMP_34	Present clear link to pathway for background documents/ stepped instructions on how to access POMs reports for specific water bodies, e.g. a worked example. People who cannot access a PC or broadband for to access documentation online and via Water Maps need to be considered	This comment has been noted. The plan contains more detailed linkages to background documents Information requests will be facilitated by the River Basin District Office and the relevant Local Authorities, however web access is available via libraries
<b>An Taisce</b> SW_RBMP_33	The use of “n/a” on the water maps is ambiguous. The reporting sheets generated by the interactive water mapping system, WaterMaps[1], for a given water body are difficult to interpret. They are not clear with regard to the environmental objectives for the water body, nor for measures being proposed to reach the objective. The references within the Draft Plan, which refer to background documents, are often too vague to be useful. The link to the Background data in the Draft Plan is inadequate and imprecise. Any reference within the Draft Plan should be made back to the exact location of the information. Stakeholder ability to make meaningful input to the Draft Plan is curtailed by lack of access to all the available data. Comprehensive geographical information on locations of threats & pressures and monitoring results are available on the EDEN system, to which public authorities have access. For meaningful public participation to occur, all stakeholders should also have access to this vital information also.	This comment has been noted. Watermaps has been updated This comment has been noted. Watermaps has been updated These comments have been noted. The plan contains more detailed linkages to background documents This comment has been noted and forwarded to the EPA who is developing EDEN.

#### 4.23. Waterbody Specific Issues

Organisation	Waterbody Specific Issue	RESPONSE
<b>Lough Leane Working Group SW_RBMP_11</b>	The interim quality status designations for the various water bodies included in the plan, there were questions raised in relation to the surprise designation of Muckcross Lake as being of “moderate” quality. The Group was strongly of the opinion that this particular designation highlighted certain issues and problems in relation to the water quality status designation process carried out as part of the plan preparation. In addition, members also queried the logic of the “one-out all-out” policy used in relation to the designation of overall quality status for waterbodies.	The biological elements; macrophytes, phytoplankton biomass, and the nutrient parameters, ammonia and total phosphorus all put Muckcross Lake in high status. However, NPWS considered it to be in unfavourable conservation status (Najas UCS in L. Adoolig, Upper L, Muckcross, L'See M. margaritifera and Najas databases) as a consequence, it was designated moderate for interim status.
<b>Killarney Nature Conservation group SW_RBMP_12</b>	The main reservations (with reference to the draft plan) have to do with the characterisation analysis for Muckcross – or the Middle – Lake in the Laune catchment. Map 1 (p. 13) determines that this lake is of “moderate” ecological status; Map 2 (p. 15) determines that it is of “poor” surface water chemical status and Map 3 (p. 17) suggests that it and its surrounding area are of “poor” groundwater status. Continuous biological and chemical monitoring of this lake since the 1960s carried out by NPWS, Kerry Co. Council etc, however, indicate that it has never once fluctuated from oligotrophic standard in this timeframe. Littoral and profundal testing on species density and diversity, during the same timeframe, clearly indicate that not only is the characterisation analysis inaccurate, it is in fact one of the cleanest water bodies anywhere in Western Europe. In its catchment area agricultural inputs are minimal, there is little if any commercial activity which could impact on water quality and the number of houses in this vast rural area is so small as to be regarded as insignificant.	The biological elements returned the following status; macrophytes - Good, phytoplankton biomass i.e. chlorophyll - High, fish - Good and the nutrient parameters; ammonia and total phosphorus returned moderate status. Consequently, because of nutrient levels, Lough Leane was assigned moderate interim status. NPWS considered it to be in unfavourable conservation also setting interim status as moderate.
	Also, on the website it is referred to as being unmonitored and to be determined. As part of the Lough Leane Project the lake has received an extraordinary amount of monitoring and investigation by Kerry Co. Council at a high cost. This needs to be reflected by the true status being allocated in the Plan. Clearly, the foregoing anomalies need to be rectified before the	The 'watermaps' website will be updated.

Organisation	Waterbody Specific Issue	RESPONSE
	Plan is adopted by the SWRBD executive.	
<b>GSI SW_RBMP_37</b>	The Tydavnet Groundwater Body does not appear to be classified as at risk of over abstraction, although historically the groundwater levels were decreasing. Is this because groundwater abstractions have decreased and groundwater levels are recovering?	<p>From a hydrogeological perspective the Tydavnet GWB was never at risk from over abstraction. It was the adjacent Knockatallon GWB that was at risk. The Tydvanet well field was mostly located in the Knockatallon GWB.</p> <p>In recent times the amount of groundwater abstracted from this well field has been reduced because of the abstraction risk identified. Bruce Misstear of Trinity College have carried out a lot of research in this area and may be referred to for further information.</p>

#### 4.24. Editorial Amendments

Organisation	Editorial Amendments
AN TAISCE	<p><b>ALL OF THE ORGANISATIONS LISTED ON THIS PAGE SUBMITTED EDITORIAL COMMENTS. FOR FURTHER INFORMATION ON THESE SUBMISSIONS PLEASE CONTACT THE NS2 PROJECT OFFICE.</b></p>
DAFF	
DCENR	
EPA	
GSI	
IRISH WILDLIFE TRUST	
SOUTHERN WESTERN REGIONAL FISHERIES BOARD	