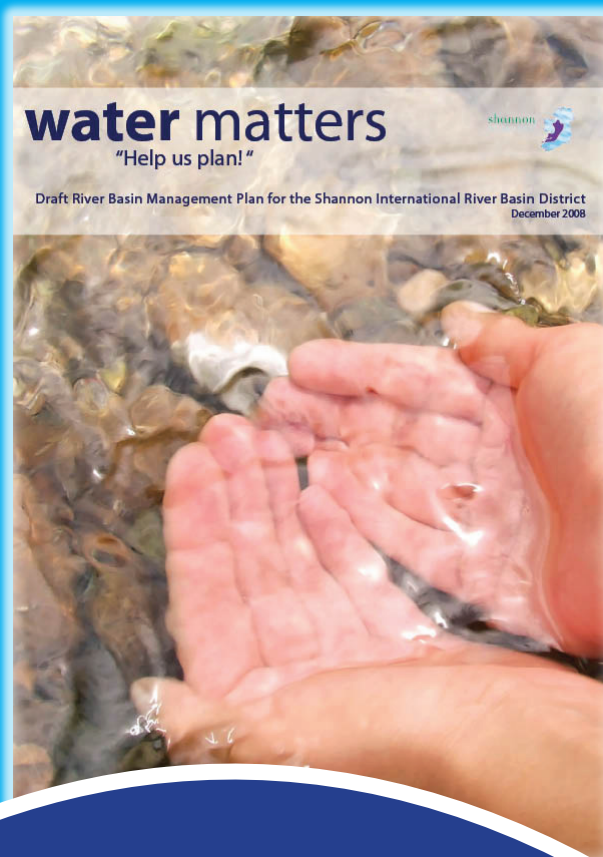




# DIGEST OF SUBMISSIONS & RESPONSES

to the draft River Basin Management Plan for the Shannon  
International River Basin District





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## **1.0 Introduction**

A draft River Basin Management Plans for the Shannon International River Basin District was published on the 22<sup>nd</sup> December 2008, and was subject to public consultation for six months until 22<sup>nd</sup> June 2009. Activities included a variety of meetings, briefings and information sessions. This report summarises the submissions made on the draft plan during that period and presents the responses to those submissions.

### ***1.1 Background***

The EU Water Framework Directive (2000/60/EC) (WFD) was adopted in 2000 and has been transposed into Irish law by the European Communities (Water Policy) Regulations 2003 (S.I. No. 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) and requires the preparation of River Basin Management Plans for all of the waters in the 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 Ireland and three are International River Basin Districts (IRBDs) because their catchments lie partly in Ireland and partly in Northern Ireland. The Shannon International River Basin District (ShIRBD) is one such IRBD as a small part of its area is within Northern Ireland.

The primary objective of the WFD is to prevent deterioration in the existing status of all waters (including maintaining “high” and “good” status where it exists), to reduce chemical pollution and to achieve at least “good status” in 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 identified (I)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 basic and supplementary measures in order to achieve those objectives at a waterbody level. Basic measures comprise the full implementation of existing EU Directives and new statutory controls. Supplementary measures are required where the basic measures will not achieve the objectives and 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 Habitats Directive Assessment (HDA) and all subsequent review of the RBMPs and POMs, as committed to under the WFD, are also subject to these processes.

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Table 1.0 below outlines the deadlines for various requirements under the Water Framework Directive up to the end of the first River Basin Management Plan cycle in 2015.

**Table 1.0 Implementation Timeline of the Water Framework Directive**

Year	Requirement
2000	Directive entered into force (Article 22)
2003	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).
2004	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)
2005	Establish criteria for the assessment of good groundwater chemical status and criteria for identifying significant upward trends (Article 17)
2006	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)
2007	Publish, for consultation, an interim overview of the significant water management issues in each RBD and IRBD (Article 14).
2008	Publish full draft RBMPs for consultation (Article 14).
2009	Finalise and publish first RBMPs (Article 13). Finalise PROGRAMME OF MEASURES to meet objectives (Article 11).
2010	Introduce pricing policies (Article 9).
2012	Ensure PROGRAMME OF MEASURES operational (Article 11). Publish timetable and work programme for second RBMPs. Report progress in implementing measures (Article 15)
2013	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.
2014	Publish second draft RBMPs for consultation.
2015	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***

A draft RBMP for the ShIRBD was published on the 22<sup>nd</sup> December 2008, and consultation on the draft plans took place until 22<sup>nd</sup> June 2009. Stakeholders and the public were invited to submit comments in relation to the draft plan through notices placed in national newspapers, through direct mailing, and also through a number of RBD, local authority and agency websites.

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As part of the consultation process a series of public information events were held nationwide between 20<sup>th</sup> April 2009 and 14<sup>th</sup> May 2009, a number of which were in, or adjacent to, the Shannon IRBD. Venues and dates of such events are listed in Table 2 below. These events were advertised on both national and local media, through direct mailing and also through websites as above.

**Table 2.0 - Public Consultation Events**

<b>Date</b>	<b>Location</b>	<b>Venue</b>
Monday 27 <sup>th</sup> April	Sligo*	Sligo Pak Hotel, Sligo, Co.Sligo
Tuesday 28 <sup>th</sup> April	Portlaoise*	Council Chamber, Aras and Chontae, Portlaoise, Co.Laois
Tuesday, 28 <sup>th</sup> April	Ennis	Clare County Council Foyer, Ennis, Co.Clare
Thursday 30 <sup>th</sup> April	Galway*	County Hall, Prospect Hill, Galway, Co.Galway
Tuesday 5 <sup>th</sup> May	Cavan*	Cavan Crystal Hotel, Dublin Road, Cavan, Co.Cavan
Tuesday 5 <sup>th</sup> May	Limerick	Limerick County Council Foyer, Dooradoyle, Limerick, Co.Limerick
Wednesday 6 <sup>th</sup> May	Athlone	Sheraton Hotel, Gleeson Street, Athlone, Co Westmeath
Thursday 7 <sup>th</sup> May	Carrick-on-Shannon	Bush Hotel, Carrick-on-Shannon, Co.Leitrim
Thursday 7 <sup>th</sup> May	Mallow*	GAA Sports Complex, Mallow, Co.Cork
Tuesday 12 <sup>th</sup> May	Killarney*	Killarney Library, Rock Road, Killarney, Co.Kerry

\*denotes event being hosted by other River Basin Districts (Western, North Western, South Eastern, South Western)

The information events gave elected representatives, stakeholder groups and the wider public an opportunity to meet with the project team, gather information on the ShIRBD, be introduced to use of the web-based RBMP map viewer, and give their views and comments on the draft plans and associated Strategic Environmental and Habitats Directive Assessments. Comment was also facilitated through completion of questionnaires.

Such consultation on the draft of this plan allowed detailed consideration of public and other stakeholder views on key management issues and the actions and timescales proposed to address them. A summary of the key submissions and a brief response of same is outlined in table 4.0, while more detailed listing of issues raised and responses given, is outlined in Section 3.2.

### ***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. Responses have been made to submissions, and all are being considered during the development of the final river basin management plans. 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 to download at [www.shannonrbd.com](http://www.shannonrbd.com) and [www.wfdireland.ie](http://www.wfdireland.ie).

## 2.0 Summary of submissions

### 2.1 Submissions

A total of 66 written submissions (totaling 516 pages) were received in relation to the draft River Basin Management Plan for the Shannon IRBD. Twenty five of the submissions (totaling 263 pages) were common to a number of RBDs. The average length of submission was 8 pages with the minimum being one and the maximum being 45 pages. The breakdown of submissions per sector was:

- Local Authorities 11 (+ 1 Strategic Policy Committee);
- Public Authorities 15;
- Non Government Organisations 21;
- Business 7;
- Private Individuals 11.

Table 3 lists the organizations and individuals that made submissions during the consultation process.

### **Referencing system**

Reference codes have been assigned to the organisations and individuals that made submissions as shown in table 3.0.

**Table 3.0 - Organisations and Reference Codes for submissions**

<b>Ref Code</b>	<b>Name</b>	<b>Organisation</b>
SH_RBMP_001	Cllr.Christy Curtin	<i>Clare Co Co</i>
SH_RBMP_002	Michael J.Webb	<i>Private Individual</i>
SH_RBMP_003	Thomas Forde	<i>Private Individual</i>
SH_RBMP_004	John O'Shaughnessy	<i>Limerick City Co</i>
SH_RBMP_005	Pat Murtagh	<i>Roscommon Co Co</i>
SH_RBMP_006	B.F.Arthure	<i>Private Individual</i>
SH_RBMP_007	Anonymous	<i>Private Individual</i>
SH_RBMP_008	Aidan Larkin/Joe Maxwell	<i>Offaly/Westmeath IFA</i>
SH_RBMP_009	Brendan Barnes	<i>Animal &amp; Plant Health Association Ltd</i>
SH_RBMP_010	Teresa Fitzgerald	<i>Kerry Ingredients</i>
SH_RBMP_011	Dr.Tom Pickerell	<i>Shellfish Association of Great Britain</i>
SH_RBMP_012	Cliona O'Brien	<i>Heritage Council</i>
SH_RBMP_013	Michael Grace	<i>The Industrial Heritage Association of Ireland</i>
SH_RBMP_014	Shay Murtagh	<i>Shay Murtagh</i>
SH_RBMP_015	Teresa Halloran	<i>DEHLG – Development Applications Unit</i>
SH_RBMP_016	Clare Timmins	<i>DAFF</i>
SH_RBMP_017	Brian O'Mahony	<i>ESB</i>
SH_RBMP_018	Ruth Hennessy	<i>South Tipperary Co Co</i>
SH_RBMP_019	David Hogan	<i>Offaly Co Co</i>
SH_RBMP_020	Michael Boyce	<i>Kerry Co Co</i>
SH_RBMP_021	Eileen Gibbons	<i>Leitrim Co Co</i>
SH_RBMP_022	Gerry Boyle	<i>Teagasc</i>
SH_RBMP_023	William Hogg	<i>Mills &amp; Millers of Ireland</i>

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SH_RBMP_024	Ré Ó Laighléis	<i>Ballyvaughan Water Committee</i>
SH_RBMP_025	Cllr.Brian Meaney	<i>Clare Co Co</i>
SH_RBMP_026	Michael Duffy	<i>Private individual</i>
SH_RBMP_027	Siobhan Egan/Anita Donaghy	<i>Birdwatch Ireland</i>
SH_RBMP_028	Anne Goggin/Donal Brennan	<i>Limerick Co Co</i>
SH_RBMP_029	Pat Fitzgerald	<i>Private Individual</i>
SH_RBMP_030	William Shortall	<i>IFA - Kerry</i>
SH_RBMP_031	Vincent Maloney	<i>Independent Farmers Federations</i>
SH_RBMP_032	Aidan Gleeson	<i>IFA Limerick</i>
SH_RBMP_033	Seamus Murphy	<i>IFA Clare</i>
SH_RBMP_034	Mary Stack	<i>Fáilte Ireland</i>
SH_RBMP_035	Roisin Jones	<i>NI Environment Agency</i>
SH_RBMP_036	Paul Moroney	<i>Clare Co Co</i>
SH_RBMP_037	Dr.Fiona Kelly	<i>CFB</i>
SH_RBMP_038	Paul O'Reilly	<i>Midlands Gateway Chamber</i>
SH_RBMP_039	John Brennan	<i>ORS Consulting Engineers</i>
SH_RBMP_040	Liam Smyth	<i>Irish Concrete Federation</i>
SH_RBMP_041	Joanne Pender	<i>Irish Wildlife Trust</i>
SH_RBMP_042	John Gavin	<i>Laois Co Co</i>
SH_RBMP_043	Anne Bonner	<i>Westmeath Co Co</i>
SH_RBMP_044	Eoin Cuddihy	<i>IBEC</i>
SH_RBMP_045	Séana McGearty	<i>DCENR</i>
SH_RBMP_046	Peter Crossan	<i>CLEAN</i>
SH_RBMP_047	Brian Mullan	<i>Waterways Ireland</i>
SH_RBMP_048	Anny Wise	<i>Clare Association of An Taisce</i>
SH_RBMP_049	Anja Murray	<i>An Taisce – The National Trust for Ireland</i>
SH_RBMP_050	Peter Crossan & Joachim Schaefer	<i>Private Individual</i>
SH_RBMP_051	Luis Grijalva	<i>Whelan Group</i>
SH_RBMP_052	Philip O'Dea	<i>Coillte</i>
SH_RBMP_053	Saskia de Jong	<i>ATUN</i>
SH_RBMP_054	Bojana Fergan	<i>SWAN</i>
SH_RBMP_055	David Thompson	<i>Mulcair Coop</i>
SH_RBMP_056	Tom Sherlock	<i>OPW</i>
SH_RBMP_057	Ciaran Dolan	<i>ICMSA</i>
SH_RBMP_058	Enda McDonagh	<i>Bord Na Móna</i>
SH_RBMP_059	Larry Stapleton	<i>EPA</i>
SH_RBMP_060	Eleanor Ryan	<i>IFA National Environment &amp; Forestry Committees</i>
SH_RBMP_061	Eamon Cusack	<i>Shannon Regional Fisheries Board</i>
SH_RBMP_062	Tim Gleeson	<i>Private Individual</i>
SH_RBMP_063	Taly Hunter Williams	<i>GSI</i>
SH_RBMP_064	Sean O'Farrell	<i>Private Individual</i>
SH_RBMP_065	Máire Ni Chionna	<i>Galway Co Co</i>
SH_RBMP_066	Mary Moroney	<i>Clare Co Co Economic Development &amp; Planning SPC</i>

## ***2.2 Topics covered***

All the various issues that were raised in written submissions, questionnaires and comments received were abstracted and were collated by:

- 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
  - ◆ Invasive Alien Species
  - ◆ Aquaculture
  - ◆ Protecting High Quality Areas
  
- Other issues:
  - ◆ Cruising, Boating & Recreation
  - ◆ Shared Water Issues
  - ◆ Public Participation
  - ◆ Economics
  - ◆ Climate Change
  - ◆ Implementation
  - ◆ Additional Issues
  - ◆ Basic & Supplementary Measures
  - ◆ Extended Deadlines
  - ◆ Integration with other Plans
  - ◆ Website/Watermaps
  - ◆ Waterbody Specific Issues
  - ◆ Editorial Issues

### 3.0 Issues raised and Responses

#### 3.1 Summary Table of Public Consultation Key Submissions and Responses

Table 4.0 briefly summarises the broad categories of comment received and outlines the general nature of the response.

**Table 4.0 Summary of Public Participation Key Submissions and Responses**

<p><b>Comments on additional measures:</b> Some supplementary measures were suggested to deal with key issues for example water conservation, reedbeds or constructed wetlands.</p>	<p><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.</p>
<p><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.</p>	<p><b>Response:</b> These comments have been considered and the measures updated where appropriate.</p>
<p><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.</p>	<p><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.</p>
<p><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.</p>	<p><b>Response:</b> Clarification text and updates on climate change approaches under the Water Framework Directive have been provided in the final plan.</p>
<p><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.</p>	<p><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.</p>

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<p><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.</p>	<p><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 final plan..</p>
<p><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.</p>	<p><b>Response:</b> Implementation responsibilities and the role of the National Advisory Committee have been updated in the final plan.</p>
<p><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)</p>	<p><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.</p>
<p><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 consultee (for 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.</p>	<p><b>Response:</b> Detailed technical studies have reviewed these issues providing scientific data to determine cases where time extensions in objectives are necessary.</p>
<p><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.</p>	<p><b>Response:</b> Where appropriate these have been added to the register of linked plans and programmes.</p>
<p><b>Comments on monitoring and classification:</b> There were a significant number of comments about the monitoring data and classification process.</p>	<p><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).</p>
<p><b>Editorial Comments:</b> Editorial comments or corrections were submitted by several parties.</p>	<p><b>Response:</b> Where appropriate these have been included in the final plan.</p>

### 3.2 Submissions and Responses

Issues abstracted have been collated by topic as described above (Section 2.2) and are tabulated below together with a considered response.

#### 3.2.1 Wastewater and Industrial Discharges

Organisation	Wastewater & Industrial Discharge	Responses
<b>CENTRAL FISHERIES BOARD SH_RBMP_037</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 elv's to be applied.	This comment has been noted
<b>EPA SH_RBMP_059</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 final plan and reported in a background document.
<b>IFF SH_RBMP_031</b>	Request for all local authorities elected members to have the application of all municipal sludge on lands banned.	RBMP requires compliance with all basic measures including the sludge directive
	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.	
<b>IRISH WILDLIFE TRUST SH_RBMP_041</b>	Horticulture activities are not addressed in the Nitrate Directive and no measure in the Draft Plans that address this significant source of potential water pollution.	The Dangerous substances controls address this significant source of potential water pollution
	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.	These concerns form the basis for the regular periodic review and updating of the RBMPs as new plans and programmes are finalised, and the RBMP can be updated accordingly
	Heightened levels of oestrogen and other hormones in wastewater and their impacts on fish and other aquatic fauna is not considered or addressed	The Dangerous substances controls address this significant source of potential water pollution
<b>SWAN SH_RBMP_054</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

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Organisation	Wastewater & Industrial Discharge	Responses
	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	This comment has been noted and 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 and are addressing 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>IFA_Limerick SH_RBMP_032</b>	The spreading of sewerage sludge should not be allowed on agricultural land	RBMP requires compliance with all basic measures including the sludge directive
<b>Leitrim Co Co SH_RBMP_021</b>	An updated list of UWW treatment plants and S4 discharges has been forwarded.	This comment has been noted and the data will be updated accordingly
<b>PATRICK T. FITZGERALD SH_RBMP_029</b>	It is now practice to pipe treated effluent several miles from the WWTP in order to meet dilution and assimilative capacity requirements. In certain circumstances it may be worth investigating the piping of treated effluent to discharge downstream of intakes for drinking water	This comment has been noted
<b>SASKIA DE JONG SH_RBMP_053</b>	No new development should be permitted unless adequate sewage treatment capacity is in place before permission is granted	This is 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	This comment has been noted and forwarded to DEHLG for consideration
<b>SASKIA DE JONG SH_RBMP_053</b>	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 and are addressing 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>SEAN O FARRELL SH_RBMP_064</b>	Fast track the upgrading of sewerage treatment plants to tertiary levels	This comment has been noted and will be forwarded to the DEHLG for consideration. Additional treatment is included as a measure subject to technical, economic and recovery tests.

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Organisation	Wastewater & Industrial Discharge	Responses
Roscommon County Council SH_RBMP_005	Provided a number of errors and omissions in the MIR data tables previously supplied	This comment has been noted and the data will be updated accordingly
SHANNON REGIONAL FISHERIES BOARD SH_RBMP_061	Realistic measures must be applied in the planning process to restrict development where there are insufficient water resources available for both potable use and sustainable discharge of treated sewage downstream of urban areas	Planning authorities ensure that best practice is adhered to and all relevant risks are assessed when analysing planning applications for developments.

### 3.2.2 Landfills, Quarries, Mines and Contaminated Land

Organisation	Landfills, Quarries, Mines	Responses
AN TAISCE SH_RBMP_049	The threat of contamination from landfill leachate is not accounted for	This has been included in risk assessments in the section on landfills within the RBMP
SWAN SH_RBMP_054	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, its time to take action, rather than waiting for results of research.	Action has been progressed via IPPC licensing system (contaminated lands) and the Code of Practice (landfills) - these are site specific not general research investigations. Information is available from the relevant authorities
ICF Irish Concrete Federation SH_RBMP_040	All future demand for aggregates must be met from authorised sources.	The planning, licensing, EIA and enforcement are included in the basic measures. Full compliance with basic measures is a requirement of the RBMP.
	Submission asserts that many sites discharging water that do not have licences or have not been assessed. Many sites operate with licences that have not been reviewed for decades. To ensure best practice, it is important that the water pollution legislation is applied to all to whom it applies and standards are appropriate and consistent.	The new Environmental objectives (Surface Water) (2009) quality objectives requires a review of all licences by 2011.
	Transfer of groundwater to surface water sources might incorrectly be deemed an abstraction.	The quantitative status of groundwater considers these abstractions.

### 3.2.3 Agriculture

Organisation	Agriculture	Responses
AN TAISCE SH_RBMP_049	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.	The Sewage Sludge Regulations & the GAP Regulations are identified as basic measures within the plan and the GAP agricultural catchment programme will identify the role of further agricultural measures

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Organisation	Agriculture	Responses
	<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 be able to handle excess slurry waste</p> <p>Horticulture and its related problems are not addressed by the Draft Plan at all and require specific additional measures to tackle the many water issues associated with intensive horticulture.</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 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.</p>	<p>The Sewage Sludge Regulations &amp; the GAP Regulations are identified as basic measures within the plan and the GAP agricultural catchment programme will identify the role of further agricultural measures</p> <p>Release of polluting material to waters is governed by basic measures including Water Pollution and GAP Regulations</p>
<b>CENTRAL FISHERIES BOARD SH_RBMP_037</b>	<p>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.</p>	<p>The GAP agricultural catchments projects will evaluate this issue</p>
<b>DAFF SH_RBMP_016</b>	<p>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.</p>	<p>This has been included as a measure. Responsibilities have not yet been determined</p>
<b>EPA SH_RBMP_059</b>	<p>Programme for Farm Inspections for Shannon IRBD should be set out.</p>	<p>This issue of farm surveys is an implementation issue and is being considered by the relevant Government Departments</p>

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Organisation	Agriculture	Responses
<b>THE HERITAGE COUNCIL</b> SH_RBMP_012	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 as a measure. Responsibilities have not yet been determined
<b>IFA</b> SH_RBMP_060 SH_RBMP_030	Farmers in the Shannon have spend over €820m in the last two years on nutrient storage and other farmyard improvements to comply with the Nitrates Regs and the Water Framework Directive. 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 issue of farm surveys is an implementation issue and is being considered by the relevant Government Departments
<b>ICMSA</b> SH_RBMP_057	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 issue of farm surveys is an implementation issue and is being considered by the relevant Government Departments
<b>ICMSA</b> SH_RBMP_057	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 final RBMP
<b>IRISH WILDLIFE TRUST</b> SH_RBMP_041	Horticulture activities are not addressed in the Nitrate Directive and no measure in the Draft Plans that address this significant source of potential water pollution.	RBMP details that controls are in place for dangerous substances and Water Pollution Regulations are addressed through basic measures.
	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>SWAN</b> SH_RBMP_054	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.	This is an implementation issue and is being considered by the relevant Government Departments
<b>TEAGASC</b> SH_RBMP_022	Concern that 'lag time' between implementation of agri-environmental measures and improvement of water quality, is not sufficiently accounted for, the RBMPs may prematurely accommodate the implementation of unnecessarily stringent supplementary measure for the agriculture sector.	Work to evaluate the scientific basis for efficiency 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 final 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>Animal and Plant Health Association</b> SH_RBMP_009	How can agriculture cause water problems?	Nutrients (Nitrogen and Phosphorus) can be carried into waters from farmyards, from manures store leaks or from fields treated with nutrient-rich organic and chemical fertilisers.
<b>IFA Limerick</b> SH_RBMP_032	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 issue of farm surveys is an implementation issue and is being considered by the relevant Government Departments
	There must be no restrictions on the use of new or existing private wells for domestic or agricultural use	Basic measures will be applied on a waterbody by waterbody basis as required.

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	We do not agree that more land be removed from production through increased buffer zones.	This comment has been noted
<b>Tim Gleeson SH_RBMP_062</b>	Allowing farmers to construct simple cost effective liquid manure storage would in my experience eliminate almost all agricultural sources of water pollution. Regulations should encourage rather than make difficult this objective.	Gap Regulations are basic agricultural measure
<b>Limerick County Council SH_RBMP_028</b>	The lack of clear identification of the serious pressure represented by agriculture and the huge contribution of this sector to "moderate" and "poor" status in river waterbodies, particularly in areas where land use and other data clearly indicate that this is without doubt the primary pressure.	This comment has been noted
<b>MULCAIR COOP SH_RBMP_055</b>	We are extremely concerned that the draft plan indicates that additional measures are to be imposed against farmers	The GAP agricultural catchments projects will evaluate this issue
<b>Offaly County Council SH_RBMP_019</b>	Improved co-ordination between the Department of Agriculture and Food and the Department of the Environment, Heritage and Local Government in implementing the Good Agricultural Practices regulations would improve the efficiency of implementation of the regulations and address the concerns of the agricultural sector	This comment has been noted
	High concentrations of Phosphorus and Ammonium have been observed in water bodies associated with peatlands. This may be a natural phenomenon and therefore an exemption should be sought.	This comment has been noted and will forwarded to the EPA for consideration
	Greater co-operation is required between Local Authorities in carrying out farm surveys in areas straddling county boundaries	This issue of farm surveys is an implementation issue and is being considered by the relevant Government Departments
<b>SEAN O FARRELL SH_RBMP_064</b>	Greater emphasis on best practice in soil management	Gap Regulations are basic agricultural measure
	Review research and establish buffer strips to protect upland streams and river	The GAP agricultural catchments projects will evaluate this issue

### 3.2.4 Wastewater from Un-sewered Properties

Organisation	Wastewater from unsewered properties	Responses
<b>AN TAISCE SH_RBMP_049</b>	The Shannon IRBD Draft Plan needs to specifically address the issue of contamination through private waste water systems not working efficiently.	This is included as a measure
<b>SWAN SH_RBMP_054</b>	Proprietary treatment systems must be mandatory in all permissions for new one-off housing where soil percolation/assimilative capacity is insufficient.	Appropriate treatment is recommended for on-site systems
	Bye-laws (as in County Cavan) requiring certified annual de-sludging of septic tanks must be mandatory	Consideration of bye-laws is an issue for individual local authorities
<b>SWAN SH_RBMP_054</b>	Site assessment should be independently carried out, commissioned by the planning authorities in the case of private developments in order to avoid undue pressure on companies doing site assessments.	This is included as a measure
<b>IBEC SH_RBMP_044</b>	IBEC considers it vital that diffuse discharges from agricultural sources and wastewater from unsewered properties are targeted to ensure the achievement of	This comment has been noted.

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Organisation	Wastewater from unsewered properties	Responses
	the WFD	
<b>Leitrim Co Co SH_RBMP_021</b>	Number of OSWWTS identified for Co. Leitrim is considered excessive given the overall population of the County. Recommend that this be re-assessed.	These were determined through use of An Post Geodirectory and mapping of sewerage systems. Outputs being re-checked for invalid entries on An Post database
<b>Midlands Gateway CHAMBER SH_RBMP_038</b>	All proposed waste water systems should be subject to mandatory yearly maintenance and certification by qualified personnel governed by the EPA and/or Local Authorities	These comments have been noted and forwarded to DEHLG for consideration
	It is surprising that there is no training available on the installation and commissioning of these plants nor is there a panel set up comprising of individuals with sufficient training to assess a site's suitability for installation of municipal plants	
<b>ORS Consulting Engineers SH_RBMP_039</b>	All proposed waste water systems should be subject to mandatory yearly maintenance and certification by qualified personnel governed by the EPA and/or Local Authorities	These comments have been noted and forwarded to DEHLG for consideration
	It is surprising that there is no training available on the installation and commissioning of these plants nor is there a panel set up comprising of individuals with sufficient training to assess a site's suitability for installation of municipal plants	
<b>SASKIA DE JONG SH_RBMP_053</b>	Proprietary treatment systems must be mandatory in all permissions for new one-off housing where soil percolation/assimilative capacity is insufficient.	Appropriate treatment is recommended for on-site systems
	Bye-laws (as in County Cavan) requiring certified annual de-sludging of septic tanks must be mandatory	Consideration of bye-laws is an issue for individual local authorities
	A modest grant scheme to support the obligatory replacement of demonstrably failing septic tanks must be initiated in Protected Areas	This has been sent to the DEHLG for consideration
	Site assessment should be independently carried out, commissioned by the planning authorities in the case of private developments in order to avoid undue pressure on companies doing site assessments.	This is included as a measure
<b>SEAN O FARRELL SH_RBMP_064</b>	Subsidise the cost of sewerage treatment plants for private dwellers	The issue of providing grant aid for private dwellers has been raised with DEHLG for its consideration

### 3.2.5 Forestry

Organisation	Forestry	Responses
<b>AN TAISCE SH_RBMP_049</b>	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 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 airplanes 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 be apply more stringent measures in the most sensitive areas is nether 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 draft 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.
	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

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Organisation	Forestry	Responses
<b>AN TAISCE SH_RBMP_049 continued</b>	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>COILLTE SH_RBMP_052</b>	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.	The proposed measures were identified by a Working Group comprising experts from Forest Service, Coillte Teoranta, COFORD, NPWS, EP, 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.
	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.	
	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.	
	S5: Too general. This measure s/b deleted or merged with S4	
	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.	
	S7: The best time to restructure a forest stand is after clearfelling. 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.	The proposed measures were identified by a Working Group comprising experts from Forest Service, Coillte Teoranta, COFORD, NPWS, EP, 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.
	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.	
	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.	

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Organisation	Forestry	Responses
<b>COILLTE</b> <b>SH_RBMP_052</b> <b>continued</b>	<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>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.</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 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>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>	
	<p>S18: See comments under S14.</p>	
	<p>S19: See comments under S16.</p>	
<p>S21: See comments under S14 &amp; S18.</p>	<p>This comment has been noted</p>	
<p>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.</p>		
<b>DAFF</b> <b>SH_RBMP_016</b>	<p>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 that those envisaged by the draft RBMPs.</p>	<p>This comment has been noted</p>

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Organisation	Forestry	Responses
<b>DAFF SH_RBMP_016 Continued</b>	<p>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.</p>	<p>The draft plan acknowledges the necessity to focus on issues, however background documents set out the benefits of such activities.</p>
	<p>It is noted that the draft management plan for the <b>Eastern River Basin District</b> 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.</p>	<p>This comment has been noted</p>
	<p>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.</p>	<p>Coordination is taken as an overall theme in the action plan following identification of the individual issues and their measures.</p>
	<p>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.</p>	<p>Cost effectiveness analysis is required for measures where options are available on a site-by-site basis as operations arise.</p>
	<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>	

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Organisation	Forestry	Responses
<b>DAFF SH_RBMP_016 Continued</b>	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.	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 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>CENTRAL FISHERIES BOARD SH_RBMP_037</b>	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>EPA SH_RBMP_059</b>	RBD specific forest coverage stats should be included in each plan.	This comment has been noted
<b>IFA SH_RBMP_060 SH_RBMP_030</b>	IFA request a meeting with all forestry stakeholders to discuss in detail all submissions prior to completing RBMPs to coordinate the implementation of the Water Framework Directive and the Habitats Directive (Freshwater Pearl Mussel) in the forest sector.	This comment has been noted and forwarded to NPWS in relation to Freshwater Pearl Mussel plans
	IFA strongly opposes 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.	This comment has been noted
<b>IRISH WILDLIFE TRUST SH_RBMP_041</b>	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>SWAN SH_RBMP_054</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.
<b>TEAGASC SH_RBMP_022</b>	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.	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.
<b>TEAGASC SH_RBMP_022</b>	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.	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.

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Organisation	Forestry	Responses
<b>TEAGASC SH_RBMP_022</b>	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.	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.
	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 the planting of broadleaves (that are more nutrient demanding) in the aquatic zone.	Noted, although in some instances establishment of broadleaves in the aquatic zone may prove challenging.
	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>IFA Limerick SH_RBMP_032</b>	Forestry is beneficial to the environment and must not be restricted in areas which are suitable for planting, including peat and acid sensitive soils. The harvesting of forestry crops must not be interfered with	Measures included in the plans were proposed as a suite of measures the most appropriate of which should be used following site specific assessments.
<b>Laois County Council SH_RBMP_042</b>	Laois County Council has no involvement in the operation or management of afforested areas. The Council may seek derogations for a number of river bodies as the management of these afforested areas is carried out by other parties.	The DEHLG has established a high level WFD implementation group with representatives from relevant authorities. The implementation of specific measures and responsible authorities will be decided during the implementation process
<b>Limerick City Council SH_RBMP_004</b>	A detailed consultation between Water producers and Coillte should be undertaken to allow for the advance warning and mitigation measures to be put in place to prevent raw water contamination	The DEHLG has established a high level WFD implementation group with representatives from relevant authorities. Measures included in the plans were proposed as a suite of measures the most appropriate of which should be used following site specific assessments.
<b>MULCAIR COOP SH_RBMP_055</b>	We query the scientific methodology and conclusions concerning forestry on peat and acid sensitive areas	The proposed measures were identified by a Working Group comprising experts from Forest Service, Coillte Teoranta, COFORD, NPWS, EP, 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.
<b>SASKIA DE JONG SH_RBMP_053</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
<b>SHANNON REGIONAL FISHERIES</b>	The Board has become increasingly concerned about the sustainability of coniferous forestry applications being proposed and developed on peat soils. We consider that it is inappropriate to attempt any of the 20 supplementary measures specified in Table 10 to offset the water quality problems. The fact that Table 10 (in	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, EP, Fisheries,

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Organisation	Forestry	Responses
<b>BOARD SH_RBMP_061</b>	step 4) contains 20 supplementary measures requiring consideration gives credence to our argument that serious problems exist with afforestation and underscores our belief that this type of afforestation is unsustainable on peat soils especially in upland areas	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 the proposed measures would require to be trialled out at a catchments 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.

### 3.2.6 Usage and Discharge of Dangerous Substances

Organisation	Dangerous Substances	Responses
<b>CENTRAL FISHERIES BOARD SH_RBMP_037</b>	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.	Phosphorus is named as 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
<b>IRISH WILDLIFE TRUST SH_RBMP_041</b>	Chlorine and fluoride should be seriously investigated in Ireland. Its use can potentially mask ecological problems that should be addressed.	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. 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.
<b>SWAN SH_RBMP_054</b>	The treatment of drinking water supplies with chlorine, fluoride and aluminium must be independently reviewed	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.
<b>SWAN SH_RBMP_054</b>	Conduct a public awareness campaign on the use and disposal of a range of household chemicals: oils, detergents, paints, solvents, etc.	The HSA are carrying out awareness raising work under the remit of REACH and an awareness campaign is proposed for the general public.
<b>Animal and Plant Health Association SH_RBMP_009</b>	While a small number of Plant Protection Products are specifically named within the priority substances and relevant pollutants, the dangerous substances should not be applied in a generic all encompassing way.	Noted. Plant Protection Products are regulated with the aim to ensure no harmful human and animal health effects and no unacceptable environmental impact.
	An excellent opportunity to introduce the proposed National action plan on sustainable use of Pesticides	
	S9. Pesticide Use - Reduce Pesticide use. This gives the impression that farmers and land owners over use pesticides	
	S20. Develop biological control methods. This is an aspiration at present.	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.
<b>Leitrim Co Co SH_RBMP_021</b>	Recommendation of details of Sheep dip tanks that were submitted to RBD consultants are mapped.	This information can be mapped and would be useful for the investigative monitoring programmes. This information can be passed onto the EPA.
<b>SASKIA DE JONG SH_RBMP_053</b>	The treatment of drinking water supplies with chlorine, fluoride and aluminium must be independently reviewed	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.

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	Conduct a public awareness campaign on the use and disposal of a range of household chemicals: oils, detergents, paints, solvents, etc.	The HSA are carrying out awareness raising work under the remit of REACH and an awareness campaign is proposed for the general public.
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### 3.2.7 Physical Modifications

Organisation	Physical Modifications	Responses
<b>THE HERITAGE COUNCIL</b> SH_RBMP_012	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.
	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 the 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 RBMPs 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>MILLS &amp; MILLERS OF IRELAND</b> SH_RBMP_023	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 Shannon 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>SWAN</b> SH_RBMP_054	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.
<b>SWAN</b> SH_RBMP_054	Clarification on the treatment proposed for culverts is requested - Will they be retained or removed to restore streams	Physical Modifications measures includes for impassable barriers investigation in 884 waterbodies in the SHRBD as well as in 4507 waterbodies nationally. Culverts can act as potential barriers to fish migration and are therefore incorporated into the impassable barriers investigation, which will be carried out on a case by case basis.
<b>SASKIA DE JONG</b> SH_RBMP_053	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.

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	Clarification on the treatment proposed for culverts is requested - Will they be retained or removed to restore streams	Physical Modifications measure includes for impassable barriers investigation in 884 waterbodies in the SHRBD as well as in 4507 waterbodies nationally. Culverts can act as potential barriers to fish migration and are therefore incorporated into the impassable barriers investigation, which will be carried out on a case by case basis.
<b>SHANNON REGIONAL FISHERIES BOARD SH_RBMP_061</b>	The Board welcomes the physical modifications section of the Plan and fully agrees that such actions are required	This comment has been noted
	We request that the Shannon Board should be identified as one of the key statutory authorities which need to be consulted prior to the grant of any authorisation to any other body proposing to do in stream works of any sort.	This comment has been forwarded to the DEHLG for consideration
	Consideration should be given to the adoption of the "No Net Loss principle" where damage to the aquatic environment and habitats is unavoidable	This comment has been forwarded to the DEHLG for consideration

### 3.2.8 Abstractions

Organisation	Abstractions	Responses
<b>AN TAISCE SH_RBMP_049</b>	Water saving strategies have not been addressed in the Draft Plan. A recent report published notes that despite every prospect of water shortages by 2013. The Directive requires measures to promote efficient and sustainable water use	An Education and Public Awareness campaign, raising general awareness and providing information about specific water issues and their solutions are included. In addition water saving measures are included under the measures for abstractions.
	A transboundary water conservation programme needs to be developed and implanted by each Plan, to help raise awareness and provide information to the public.	This comment has been noted and will be forwarded to the DEHLG
<b>DCENR SH_RBMP_045</b>	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.	This comment has been noted and forwarded to the DEHLG for consideration under RIA process.
<b>EPA SH_RBMP_059</b>	Develop and Integrate a Drinking Water Safety Plan approach to identification of potential polluting hazards, risks and mitigation measures for critical source risks identified.	Preparation of the Water Safety plans are a basic requirement of the Surface Water Regulations and are as such a basic measure. This is already acknowledged in the plan.
<b>THE HERITAGE COUNCIL SH_RBMP_012</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 for climate change adaptation using European Union recommendations. A Strategic Environmental Assessment has being undertaken to assess the wider environmental impacts of this plan including climate change issues.
<b>IFA SH_RBMP_060 SH_RBMP_030</b>	Propose farm families who use public water supplies should have equivalency with other public water users and current restriction must be abolished.	This comment has been noted and forwarded to the DEHLG for consideration.

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Organisation	Abstractions	Responses
<b>IFF SH_RBMP_031</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>SWAN SH_RBMP_054</b>	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.	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.
	A definition of "significant" abstractions must be provided and justified.	
	Recharge data must be ascertained and available for each abstraction proposed.	
<b>AN TAISCE_CLARE SH_RBMP_048</b>	To reduce per capita water consumption. Specific actions taken by the County Council	Clare Co. Council agree fully on the need to reduce water consumption per capita –for both ecological and economic reasons. Concentration in the first instance will be to reduce leakage in Clare CC's own mains, which is of the order of 35 % to 40% of all water treated at Clare CC's Water Treatment Plants. Funding is expected from DEHLG in 2010-2012 WSIP; first concentration will be on the town of Ennis where there are c. 18km of old mains needing renewal. It is intended that, in parallel with this and subject to resources, educational & information campaigns for domestic, commercial & community consumers, would be undertaken with a view to getting all consumers to reduce leakages on their own systems and to use as little as possible. The Annual Service Indicator measure (Percentage Unaccounted For Water in the county) should show improvement as conservation monies are spent. There are no regional water services authorities at present, but each county must do a Strategic Water Plan under the Water Services Act 2007 (provision not yet brought into law) and this may lead to regional approaches where they make sense.
	To promote a range of initiatives to conserve treated water	
	To promote the harvesting of greywater	
	To adopt a regional water supply strategy based on conservation of resources	
	To provide measurable timetables and targets for water conservation	
<b>IFA Limerick SH_RBMP_032</b>	The circular sterilisation of areas around public water supply sources is unscientific, wrong and should not be applied	These comments have been noted and forwarded to the DEHLG for consideration
<b>IFA Limerick SH_RBMP_032</b>	When using public water supply provision must be made for farmers who are multiple metre users so that the cost burden is not inequitable	These comments have been noted and forwarded to the DEHLG for consideration
<b>Limerick City Council SH_RBMP_004</b>	As there are a number of abstractions from various differing Local Authorities along the River Shannon, it may be advisable for the SiRBD to consider appointing a monitoring agency to advise Local Authorities of any changes in the quality of water on an ongoing basis	THE EPA has responsibility for classifying and reporting on water quality.
<b>Midlands Gateway Chamber SH_RBMP_038</b>	We would contend that Ireland's abstraction laws need to be radically updated so as to protect waters and ensure that a modern system of registration is in place	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.

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Organisation	Abstractions	Responses
<b>B.F. ARTHURE SH_RBMP_006</b>	Under the risk report hydrology, water balance, abstraction is given as not at risk. Everybody knows that there is a demand coming from Dublin for large amounts of water to be abstracted from the Shannon to supply Dublin City and County.	The study investigating potential new sources of water for the Greater Dublin Area post 2016 identifies a number of options for a new source, some of which include potential abstraction from the Shannon system (Lough Ree, Lough Derg, and downstream of Killaloe), but also considers other options (desalination, groundwater and abstraction from the Liffey/Barrow). No decision has yet been taken on which will be the preferred option but if abstraction from the Shannon is the preferred option then it can only proceed on the basis that it will not impact negatively on the aquatic ecosystems of the Shannon and thus prevent the attainment of "good status" as required by the WFD and as set out in the draft River Basin Management Plan for the Shannon IRBD.  An Environmental Report was produced as part of the Water Supply Project - Dublin Region Strategic Environmental Assessment which identified that the proposed abstraction from Lough Ree would not impact the ecological functioning downstream.
	I am absolutely certain, provided I can only rely on the laws of gravity, that the abstraction of large amounts of water above Limerick will result in the upstream movement of the limit of tidal influence	
	Shannon RBD produced a report in Dec, 2008, to the effect that there would be no risk relating to water abstraction upstream of Limerick, didn't they?	
<b>PATRICK T. FITZGERALD SH_RBMP_029</b>	All local authorities in the basin engage consultants to design supply schemes individually. The Department of Environment inspectors who approve these schemes are in a position to co-ordinate an overall strategy for the basin	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. The regulations will identify who will be responsible for authorising any such abstractions  This comment has been noted and forwarded to the DEHLG for consideration
	The practice of mixing groundwater with surface water by some LAs should be reviewed.	
<b>PETER CROSSAN SH_RBMP_050</b>	Strategies and Policies relating to Regional Supplies and piping water across entire catchments raises questions about sustainability. All LAs should engage consultants to design supply schemes individually and DEHLG inspectors to co-ordinate an overall strategy for the basin.	This comment has been noted and forwarded to the DEHLG for consideration
<b>SASKIA DE JONG SH_RBMP_053</b>	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.	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.
	A definition of "significant" abstractions must be provided and justified.	
	Recharge data must be ascertained and available for each abstraction proposed.	
<b>SEAN O FARRELL SH_RBMP_064</b>	There is a need for stricter control on the extraction of water from rivers	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. The application process will identify any monitoring or assessment requirements.
<b>SHANNON REGIONAL FISHERIES BOARD SH_RBMP_061</b>	A dry weather flow (DWF) needs to be established for each abstraction and this may need to be revised in the context of climate change	The WFD requires a registration and authorisation system to control impacts of abstractions and future abstractions. This also forms part of the basis for the regular renewal and updating of the RBMP and POM. Measures have been assessed for climate change adaptation using European Union recommendations. A Strategic Environmental Assessment has been undertaken to assess the wider environmental impacts of this plan including climate change issues.
	In the context of abstraction for hydro-power we consider that it is important to apply the 25% of DWF rule	

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Organisation	Abstractions	Responses
	In the context of water abstraction from lakes we are seriously concerned that over abstraction may be permitted such that significant amounts of lake shore will be exposed and desiccation of the flora and fauna species therein will take place	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.
	An objective of the Plan should require a programme of urgent measures to reduce wastage in portable water systems supplied from lakes and rivers. Such measures should include strong public awareness programmes and the adoption of system that will bring home to the individual or community the need for water use reduction	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 measures. Water conservation initiatives are included in the programme of measures.
<b>Shay Murtagh SH_RBMP_014</b>	Rainwater harvesting should be promoted.	This is included as a measure for abstractions

### 3.2.9 Invasive and Alien Species

Organisation	Invasive Alien Species	Responses
<b>AN TAISCE SH_RBMP_049</b>	The issue of invasive species has also not been adequately addressed; this is an area of increasing concern. The Draft Plan has not developed an adequate scheme to tackle the issue, nor has it highlighted the magnitude of the treat that invasive species pose.	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.
<b>CENTRAL FISHERIES BOARD SH_RBMP_037</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>EPA SH_RBMP_059</b>	Invasive Alien Species of particular concern in each RBD should be 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.
<b>THE HERITAGE COUNCIL SH_RBMP_012</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 has 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>IRISH WILDLIFE TRUST SH_RBMP_041</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

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Organisation	Invasive Alien Species	Responses
<b>SWAN SH_RBMP_054</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>IFA_Limerick SH_RBMP_032</b>	Wildlife on waterways is being devastated by a non-native predator the mink. An action plan must be implemented to eradicate this predator.	The significant potential impacts from the spread of invasive species has 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>PETER CROSSAN SH_RBMP_050</b>	Suitable avoidance measures should be developed and avoidance and mitigation measures implemented and enforced to prevent alien invasive species destroying the indigenous community of species.	The significant potential impacts from the spread of invasive species has 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>MULCAIR COOP SH_RBMP_055</b>	Zebra mussel, how did it get into Lough Derg	In the same way that the Zebra mussels have spread through out the Shannon catchment. The zebra mussel probably arrived in Ireland in 1994 attached to the hulls of second-hand boats imported from Britain or the Netherlands.
<b>SASKIA DE JONG SH_RBMP_053</b>	Lists of known invasive alien species must be included in Plans.	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.	Comment 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.

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Organisation	Invasive Alien Species	Responses
<b>SHANNON REGIONAL FISHERIES BOARD SH_RBMP_061</b>	We are seriously concerned about the lack of legislation currently applicable in this area.	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. 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.

### 3.2.10 Aquaculture

Organisation	Aquaculture	Responses
<b>AN TAISCE SH_RBMP_049</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>DAFF SH_RBMP_016</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>IFA SH_RBMP_060 SH_RBMP_030</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 at <a href="http://www.environment.ie/en/Environment/Water/WaterQuality/ShellfishwaterDirective/ShellfishWatersFinalCharacterisationReportsandPRPs">www.environment.ie / en / Environment / Water / WaterQuality / ShellfishwaterDirective / ShellfishWatersFinalCharacterisationReportsandPRPs</a>
<b>IRISH WILDLIFE TRUST SH_RBMP_041</b>	Local pressures or adequate measures to address aquaculture are not recognised or adequately addressed in the draft Plans	Measures for aquacultural activities entail licensing and shellfish plans as described above

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<b>SWAN SH_RBMP_054</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.
	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 & Development Regulations, Wastewater & Industrial Licences.	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 aquacultural activities.
<b>SASKIA DE JONG SH_RBMP_053</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.
	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 & Development Regulations, Wastewater & Industrial Licences.	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 aquacultural activities.
<b>SHELLFISH ASSOCIATION OF GB SH_RBMP_011</b>	With the repeal of the Shellfish Waters Directive there does not appear to be any mechanism for the retention of this guidance standard, and the SAGB is extremely concerned that we will lose the protection it affords	Aquaculture activities are licensed or will fall under future licensing controls.
	The plan does not clearly specify where such exclusion of dredging in certain areas may be needed, their extent, or the nature of the restrictions	
	Another of our concerns is that protection for shellfish waters that extent further than 1nm offshore would not be provide by the WFD	This comment has been noted
	The Pacific Oyster is an economically important species for shellfish cultivation operations in the UK (1,300 tonnes produced annually), and any restrictions on cultivating this species will impact upon businesses and livelihoods in all areas	Aquaculture activities are licensed or will fall under future licensing controls.

### 3.2.11 Protecting High Quality Areas

Organisation	Protected High Quality Areas (FWPM)	Responses
<b>BIRDWATCH IRELAND</b> SH_RBMP_027	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>CENTRAL FISHERIES BOARD</b> SH_RBMP_037	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.	These comments have been noted and forwarded to the DEHLG
	Until scientific research indicates otherwise, equal weighting, in terms of sensitivity should be afforded to early life stages of salmonoids and early life stages of the pearl mussel.	
<b>EPA</b> SH_RBMP_059	Reference to RBD specific FPM plans must be used.	Specific reference to the FPM is used though out the plan under the Birds and Habitats Directives.
<b>THE HERITAGE COUNCIL</b> SH_RBMP_012	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>IFA</b> SH_RBMP_060 SH_RBMP_030	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> SH_RBMP_041	Positive Role of FPM is not recognized or highlighted. Clear felling continues in FPM catchments despite moratorium issued by DOE. Lack of enforcement by competent authorities is questioned in future in order to achieve WFD objectives.	This comment has been forwarded to DEHLG for consideration during FPM Sub basin plan preparation
<b>IFA Limerick</b> SH_RBMP_032	The pearl mussel must not be used as a water quality indicator as there is not scientific evidence to show that there is a connection between water quality and their reproduction cycle	Freshwater Pearl mussel populations are not reproducing due to unfavourable conditions thought to be water quality related and are considered to be at Unfavourable Conservation Status. Since these mussels are part of the macroinvertebrate community it reflects in the overall moderate classification of the river.

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Organisation	Protected High Quality Areas (FWPM)	Responses
<b>MULCAIR COOP SH_RBMP_055</b>	The Pearl Mussel - used to down grade our water quality because they are not reproducing - where is the scientific evidence	Freshwater Pearl mussel populations are not reproducing due to unfavourable conditions thought to be water quality related and are considered to be at Unfavourable Conservation Status. Since these mussels are part of the macroinvertebrate community it reflects in the overall moderate classification of the river. Recent survey information is presented in the FPM sub-basin plans

### 3.2.12 Cruising, Boating & Recreation

Organisation	Cruising, Boating and Recreation.....	Responses
<b>DCENR SH_RBMP_045</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>FAILTE IRELAND SH_RBMP_034</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.
<b>SWAN SH_RBMP_054</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 invasives . Suggestion forwarded to the NPWS who are involved in developing supporting measures through the national alien species study.

### 3.2.13 Shared Water Issues

Organisation	Shared Water Issues	Responses
<b>AN TAISCE SH_RBMP_049</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 the WFD	The DEHLG has established a high level WFD implementation group with representatives from relevant authorities.
<b>IRISH WILDLIFE TRUST SH_RBMP_041</b>	Unacceptable that a single plan has not been produced for the IRBDs instead of the working together document.	

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Organisation	Shared Water Issues	Responses
<b>Animal and Plant Health Association</b> SH_RBMP_009	Where Ireland has cross border river basin catchments 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.	Group. The WFD promotes common approaches, standards and measures for water management. 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>SWAN</b> SH_RBMP_054	The Plan must more clearly outline how the NS WFD Coordination Group will ensure harmonised application of WFD measures between jurisdictions and what further joint administrative arrangements will facilitate consistent River Basin District Management Plans and their cross-border delivery	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>CLEAN</b> SH_RBMP_046	It is difficult to see how achieving consistent implementation of the plans between jurisdictions can be realized	The DEHLG has established a high level WFD implementation group with representatives from relevant authorities.
<b>Laois County Council</b> SH_RBMP_042	This Council is concerned that the actions or inactions of other local authorities may lead to a failure of the effected River Body from meeting the objectives of the plan by 2015	The DEHLG has established a high level WFD implementation group with representatives from relevant authorities.

### 3.2.14 Public Participation

Organisation	Public Participation	Responses
<b>CENTRAL FISHERIES BOARD</b> SH_RBMP_037	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 existing consultation framework as the river basin plans go from adoption to implementation phase.	An awareness programme is included as a measure.
<b>IRISH WILDLIFE TRUST</b> SH_RBMP_041	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. No sufficient solution to lack of broadband internet access for the public for Water maps tool.	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
<b>SWAN</b> SH_RBMP_054	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.

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Organisation	Public Participation	Responses
	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	Information requests will be considered however access is available via libraries
	The Advisory Councils must be reconstituted in an open and transparent manner.	This comment has been noted
	Set up scheme for local initiatives engaging all relevant stakeholders in water body protection.	This comment has been noted. The appropriate level and means of engagement will be considered in the implementation process
	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
<b>Animal and Plant Health Association SH_RBMP_009</b>	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.	Agreed and will be considered in the implementation process.
<b>Ballyvaughan Water Committee SH_RBMP_024</b>	Small communities like ours have not been engaged in the formation of the plan in relation to our concerns over the possible decommissioning of our indigenous water supply.	The decommissioning of a public water supply was not a part of the draft River Basin Management Plan.
<b>Clare County Council SH_RBMP_066</b>	Members highlighted the need for an educational and advertising programme to be put in place.	An awareness programme is included as a measure.
<b>CLEAN SH_RBMP_046</b>	Public participation in practice while considered crucial to the effectiveness and the acceptance of the WFD implementation measures have not been facilitated in a meaningful way	Public participation has been a significant part of the implementation of the Water Framework Directive. Provision to allow for effective and structured public participation was enshrined in the legislation (Water Policy Regulations, SI 722 of 2003) requiring the establishment of Advisory Councils in each RBD, membership of which is open to any member/group and is publicly advertised. In addition literature is produced as required and made freely available through the network of local authority offices and libraries, and other public authorities. A website was set up for each RBD and is regularly updated. A further series of public meetings was held for consultation on the draft RBMP. Several methods of attracting members of the public to the meetings were used including direct mail, email notification, media advertisement, interviews on radio and articles in newspapers. Also RBD and local authority staff regularly participate in events organized by NGOs and other agencies.
<b>Galway County Council SH_RBMP_065</b>	The Action Plan should include owners/landowners where relevant as responsible bodies.	This comment has been noted -responsible bodies have been extracted from relevant legislation
<b>IFA Limerick SH_RBMP_032</b>	The present misinformation concerning pollution should be made illegal. Cattle are portrayed as the biggest polluters. Farmers must be listened to and co-operated with if we are to achieve our objective of high quality water	An awareness programme is included as a measure.

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Organisation	Public Participation	Responses
<b>PETER CROSSAN SH_RBMP_050</b>	The public has not been facilitated or encouraged to become involved in the preparation and the determination of this draft plan	Public participation has been a significant part of the implementation of the Water Framework Directive. Provision to allow for effective and structured public participation was enshrined in the legislation (Water Policy Regulations, SI 722 of 2003) requiring the establishment of Advisory Councils in each RBD, membership of which is open to any member/group and is publicly advertised. In addition literature is produced as required and made freely available through the network of local authority offices and libraries, and other public authorities. A website was set up for each RBD and is regularly updated. A further series of public meetings was held for consultation on the draft RBMP. Several methods of attracting members of the public to the meetings were used including direct mail, email notification, media advertisement, interviews on radio and articles in newspapers. Also RBD and local authority staff regularly participate in events organized by NGOs and other agencies.
	We consider the requirement for a new draft reflecting the submissions which have been made, be published and hopefully this new and improved draft can provide a meaningful vehicle for public participation, the basis of which will provide for a final Plan.	
	It is our opinion that the consultation process leading to this draft plan which is the subject of our comment with NGOs is of no value as the plan as drafted does not reflect sufficiently, the significant issues raised by the NGOs when commenting on the earlier publication "Water Matters have your say"	
<b>CLLR. BRIAN MEANEY SH_RBMP_025</b>	The fact that a broadband connection was reqd to get proper access to the Plan, and that this was not available in all of the area to which the Plan relates, may be used to undo efforts to seek compliance when the requirements of the Plan require enforcement by the local authorities	This comment has been noted
<b>SASKIA DE JONG SH_RBMP_053</b>	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	Information requests will be considered however access is available via libraries
	The Advisory Councils must be reconstituted in an open and transparent manner.	This comment has been noted
	Set up scheme for local initiatives engaging all relevant stakeholders in water body protection.	This comment has been noted. The appropriate level and means of engagement will be considered in the implementation process

### 3.2.15 Economics

Organisation	Economics	Responses
<b>AN TAISCE SH_RBMP_049</b>	Information regarding proposed budgets is deficient. The SH 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 Plan must include informative and comprehensive economic analysis.	The costing of wastewater treatment plant and on-site measures has been included in the plan. The resourcing of plan implementation is being considered by the relevant authorities who will produce implementation programmes.

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Organisation	Economics	Responses
	<p>The SH 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.</p> <p>Even within the background information there is a lack of clear justification with regard to economic analysis, for example many measures are not properly quantified, nor are the HMWB designations properly detailed.</p>	
<b>AN TAISCE SH_RBMP_049</b>	<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>	
<b>EPA SH_RBMP_059</b>	Clarification of Disproportionate cost test and status of various economic tests on supplementary measures.	The costing of wastewater treatment plant and on-site measures has been included in the plan.
<b>IFF SH_RBMP_031</b>	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>IRISH WILDLIFE TRUST SH_RBMP_041</b>	<p>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.</p> <p>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.</p>	The costing of wastewater treatment plant and on-site measures has been included in the plan.
<b>SWAN SH_RBMP_054</b>	<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>The costing of wastewater treatment plant and on-site measures has been included in the plan.</p> <p>This has been included addressed in the programme of measures</p>
<b>Planning &amp; Development Strategic Policy Committee, Clare County Council SH_RBMP_066</b>	Members expressed their concerns in relation to any price increases in respect of water, particularly for businesses	This comment has been noted and forwarded to the DEHLG

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Organisation	Economics	Responses
<b>IBEC</b> <b>SH_RBMP_044</b>	The River Basin Management framework must bring the transparency and accountability required by the non-domestic sector. Businesses need reassurances that they are only paying the amounts required by law and that charges to the non-domestic sector are not countervailing shortfalls in local authority revenue or cross subsidising the cost of water provision to the domestic sector.	These comments have been noted and will be forwarded to the DEHLG for consideration
	The government decision to abstain from universal water charging has led to some controversy and is perceived as compromising water conservation measures. IBEC wants local authorities and the government to revisit this issue.	
	The economic cost of measures is a significant concern for business and it is regrettable at this stage that transparent cost options are not available.	The costing of wastewater treatment plant and on-site measures has been included in the plan.
	IBEC considers it vital that thorough and transparent cost effectiveness studies are completed with real options to choose between to ensure value for money when the final measures are agreed upon.	
	Due consideration must be given to the balance between the objectives of economic and environmental sustainability	
<b>SASKIA DE JONG</b> <b>SH_RBMP_053</b>	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	The costing of wastewater treatment plant and on-site measures has been included in the plan.
	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.	
	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	This has been addressed in the programme of measures
<b>SHANNON REGIONAL FISHERIES BOARD</b> <b>SH_RBMP_061</b>	Plan should examine the economic importance of water and the costs of producing and abstracting water in the catchment.	The costing of wastewater treatment plant and on-site measures has been included in the plan.

### 3.2.16 Climate Change

Organisation	Climate Change	Responses
<b>AN TAISCE</b> <b>SH_RBMP_049</b>	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.	An update on climate change has been included in the plan

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Organisation	Climate Change	Responses
	Climate change dealt with in a reactive manner instead of proposing proactive 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.	Wetlands are a measure to address morphology pressures.
<b>CENTRAL FISHERIES BOARD</b> <b>SH_RBMP_037</b>	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.	An update on climate change has been included in the plan
	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.	An SEA has been ongoing in parallel with the draft and final plans
<b>EPA SH_RBMP_059</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
<b>FAILTE IRELAND</b> <b>SH_RBMP_034</b>	Consideration within the plan to the issue of climate change	An update on climate change has been included in the plan
<b>THE HERITAGE COUNCIL</b> <b>SH_RBMP_012</b>	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>	These comments have been noted. The recommendations will be 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.
	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	
	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.	
<b>IRISH WILDLIFE TRUST</b> <b>SH_RBMP_041</b>	Climate change and sea level rise need to be addressed by the plans.	These comments have been noted. An update on climate change has been included in the plan
	Reduction in rainfall and higher temperatures leading to eutrophication also need to be considered.	
	Local Authority Development Plans must include actions or proposals for climate change.	
<b>SWAN</b> <b>SH_RBMP_054</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>AN TAISCE CLARE</b> <b>SH_RBMP_048</b>	To enhance all sectors of Biodiversity in the region. Specific actions taken by the County Council	These comments have been noted and forwarded to Clare Co. Council, the EPA and NPWS for consideration
	To restore the rivers of the region to the highest salmonid water quality status by 2015	
	To enhance biodiversity in all land use	
	To initiate native tree planting campaigns in conjunction with schools and communities across the region, with school classes as they rise in age been guardians of individual or groups of trees	

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Organisation	Climate Change	Responses
	To identify locations suitable for and create wetland areas for invertebrates and as wildlife refuges	
	To provide measurable timetables and targets for biodiversity	

### 3.2.17 Implementation

Organisation	Implementation	Responses
<b>AN TAISCE SH_RBMP_049</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.	These comments have been noted and forwarded to the EPA. Investigative measures to confirm status and pressures are recommended in the plan. Parameters measured in assigning status are tabulated in the final 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. The final assessment of status will be determined by the EPA by 2011 in accordance with the Environmental Objectives Surface Water Regulations.
	A large portion of the waters within the Shannon Draft Plan have not had each of the different statuses established yet. 55% of coastal waters need their surface ecological status to be determined; while 99% of rivers and canals, 88% of Lakes and Reservoirs and 100% of estuaries and coastal waters all need to have their chemical status determined.	
	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.	
	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.	
	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.	
	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.	
	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.	
	There was no consultation as to the location of the monitoring sites, yet these should be justified	
	Sampling methodology needs to be transparent so that its validity can be assessed.	
	A monitoring scheme should be set-up to ensure that implemented measures do not create adverse impacts that go undetected.	

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<b>AN TAISCE SH_RBMP_049</b>	A monitoring scheme should be set-up to ensure that implemented measures do not create adverse impacts that go undetected.	
	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.	
	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.	
	The secondary effects of failure to implement measures are not addressed within the Draft Plan.	
	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.	
<b>BIRDWATCH IRELAND SH_RBMP_027</b>	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.	This comment has been noted and forwarded to the EPA and NPWS for consideration
<b>CENTRAL FISHERIES BOARD SH_RBMP_037</b>	Necessary to continue to undertake the necessary surveys in order to assign a typology classification to all lakes within the RBD.	This comment has been noted and forwarded to the EPA for consideration
<b>DAFF SH_RBMP_016</b>	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>EPA SH_RBMP_059</b>	SH Ecological Status - Biology Classification Systems. Should state that classification tools have 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
<b>ESB SH_RBMP_017</b>	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.	This comment has been noted
<b>IRISH WILDLIFE TRUST SH_RBMP_041</b>	Sampling methodology needs to be transparent so validity can be assessed.	These comments have been noted and forwarded to the EPA for consideration. 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	

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	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.		
	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 considered.
	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 issue throughout the SWMI, draft plan and final plans
<b>MILLS &amp; MILLERS OF IRELAND SH_RBMP_023</b>	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.	This offer of monitoring programme support has been noted and passed to the EPA	
<b>SWAN SH_RBMP_054</b>	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	Such classification information has been tabulated in the water management unit action plans included in the final plan	
	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 water bodies where they hold no data at present, and that are not included in the present monitoring programme	This comment has been noted and will be forwarded to the EPA for consideration	
	The RBD Management Plans (and www.wfdireland.ie 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>SWAN SH_RBMP_054</b>	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.	Compliance assessments are carried out by the EPA and other agencies	
<b>TEAGASC SH_RBMP_022</b>	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).	These comments have been noted and will be forwarded to the EPA for consideration	

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	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 not be sufficient for ensuring that the consequences of agricultural mitigation of diffuse nutrient transfer has been captured.	
	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 (>50 mg L-1 CaCO3)	
	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.	
	Agricultural Catchment programme commenced in 2008 will feed into the 2 <sup>nd</sup> review of the SI 378 (2006) and SI 101 (2009).	
	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.	
<b>Kerry County Council SH_RBMP_020</b>	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. The plan does not appear to contain specifics on the means by which implementation of the measures is to be coordinated among the various agencies involved	Measures have been identified for each waterbody. Additional details on timing of implementation will be available following compilation of the implementation programmes for the Districts.
	Full implementation of the measures, both basic and supplementary, which have been proposed in the draft plan would entail considerable expenditure on the part of the local authorities involved..... The availability of funding from the State, therefore, needs to be established in the first instance.	This comment has been noted and forwarded to the EPA. Substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive
	We believe, therefore, that alternative objectives, in the form of revised timescales and deadlines (i.e. beyond 2015) need to be proposed for many of the waterbodies which are currently classified as being of "less than good" status.	This comment has been noted
<b>Kerry County Council SH_RBMP_020</b>	It is our recommendation that an extension of time should be sought at European level to allow satisfactory finalisation and adoption	This comment has been noted
<b>Ballyvaughan Water Committee SH_RBMP_024</b>	The general aspirations of the plan seem positive but are vague and woolly as to specifics	Measures and objectives have been identified for each waterbody.
	It is of concern to us that when on Page 37 it is stated that "In the Shannon District there are 9 lakes at risk", the name of no particular lake is identified.	Editorial comment

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<b>Clare County Council</b> SH_RBMP_036	The draft Plan would also benefit from the addition of a user friendly guidance document The actions specified for stakeholders or for Local Authorities are exceptionally vague, with no iterative process on the achievement of any actions	This comment has been noted. Watermaps has been updated  Additional details on prioritisation, timing and implementation will be available following compilation of the implementation programmes for the Districts.
	There is no indication of what recourse a Local Authority will have if it considers that another public body is not satisfactorily fulfilling its role in the Plan.	All Local Authorities and other public bodies will be subject to the same compliance assessments carried out by the EPA and other agencies
	In terms of reaching "high" and "good" status, the plan is unclear in respect of who will arbitrate on whether high/good status is met, or on what continual monitoring if any will be undertaken	This comment has been noted and forwarded to the EPA for consideration
	For example, the provision of collection systems and treatment plants to meet the requirements of the Urban Wastewater Treatment Directive alone, not to mention more stringent requirements associated with protected habitats, will require very significant planning and investment schemes	This comment has been noted and forwarded to the DEHLG for consideration
	Prediction of a realistic time frame for restoration of "good" status for Margetifera margetifera waters is guesswork. This is a significant weakness in the Draft Plan	This has been considered in the objective setting process however protected areas have specific requirements.
<b>Planning &amp; Development Strategic Policy Committee, Clare County Council</b> SH_RBMP_066	Members expressed their concerns in relation to the expense and level of co-operation required in the implementation of the Plan. Members felt implementation of Plan should be more gradual	This comment has been noted and forwarded to the DEHLG
<b>CLEAN</b> SH_RBMP_046	What is presented in this draft plan aims to extend the deadline period while attempting only to put forward implementation measures to address issues of concern	The decision making rationale is included in the background documents
	It is vital that it receives the recognition that it deserves and that the fullest implementation of the measures contained within be brought into being	These comments are noted
	Money must be spent on bringing the core objectives of this directive into being. This can only be achieved through openness and transparency and with the fullness of public participation	
	The draft plan in no way can be considered to be a serious engagement with the issues associated with the provisions on the implementation of the directive.	Additional details on implementation will be available following compilation of the implementation programmes for the Districts.
	We cannot move forward to adopting a plan which will provide the blue print for the next 6 years that does not deal with the totality of requirements intended under the terms of the various directives.	The requirements of the relevant directives are contained in the plan's programme of measures
<b>Galway County Council</b> SH_RBMP_065	Galway County Council is focusing its resources on those actions that deliver the greatest degree of protection of water resources	These comments have been noted
	At present Galway County Council cannot assent to certain of the proposed objectives due to financial and staffing constraints	

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	Where there is new work to be carried out by local authorities within the next few years, Galway County Council cannot make commitments for the present, due to the negative outlook for local authority and central government finances	
	The Action Plan proposes some actions that may not be technically possible and some actions where the deadline has already passed	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.
<b>IBEC SH_RBMP_044</b>	IBEC wants reassurance that appropriate stakeholder interaction takes place post-consultation to ensure transparency	This comment has been noted costing of WWTP and on-site systems measures has been for the WMU action plans
	Open and bottom-up consultation should ensure that there is no ambiguity about costs and benefits of supplementary measures and vindicate, or cause the reappraisal of, stated objectives.	
<b>IFA Limerick SH_RBMP_032</b>	In light of the lack of treatment plants we wonder if the county council are serious about improving water quality	There is a substantial programme of investment in wastewater treatment plants being developed to address where these have been identified as the main cause of the problem
<b>South Tipperary County Council SH_RBMP_018</b>	It is the opinion of South Tipperary County Council that many of the objectives set out in the draft plan are overly ambitious, unrealistic and unachievable given the current shortage of resources in this local authority.	Additional details on prioritisation, timing and implementation will be available following compilation of the implementation programmes for the Districts.
	The draft plan does not utilise the facility in the Water Framework Directive to plan and prioritise improvements over successive implementation cycles.	
	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.	
	The cost of implementing the RBMPs must be justified and staggered over successive planning cycles allowing improvements and investment to be prioritised in water bodies where they will be most cost effective and most beneficial.	
<b>Waterways Ireland SH_RBMP_047</b>	Waterways Ireland would seek to ensure that as the River Basin Management Plans are developed its statutory functions and obligations are fully incorporated through agreed sustainable and reasonable methodologies	This comment has been noted.
<b>KERRY INGREDIENTS SH_RBMP_010</b>	It is recommended that the unit set up by Limerick County Council to co-ordinate the work of the statutory authorities in the implementation of the Plan should also include the co-ordination of the implementation of the programme of measures in the Glen River sub-catchment	This comment has been noted
<b>Laois County Council SH_RBMP_042</b>	If is felt that a more focussed approach would concentrate efforts on measures that would have very significant benefits and may be more cost effective	Additional details on timing of implementation of measures, including cost effectiveness analysis, will be available following compilation of the implementation programmes for the Districts.
	This council will also seek to implement supplementary measures where they are deemed to be practicable, appropriate, effective and value for money	This comment has been noted

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	It is not likely that Laois County Council will be in a position to have carried out all necessary infrastructural works to bring water quality in the river bodies affected up to the required standards by 2015	This comment has been noted and forwarded to the DEHLG for consideration
	Some of the river bodies have no water quality data recorded for them and their status is extrapolated from data in a neighbouring sub-catchment. The quantity and nature or required actions to be carried out by the Council therefore cannot be established at this time	These comments have been noted and forwarded to the EPA for consideration. Final classification will be assigned by the EPA in 2011 in accordance with the recent surface water regulations
	Concerned that as yet unknown substantial financial impositions will be placed on it to achieve the objectives without being given the funding to carry out the necessary works.	Substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive
<b>Leitrim Co Co SH_RBMP_021</b>	Leitrim Co Co will not be in a position to implement the plan. It is therefore felt necessary that it is stated in the plan that implementation of the POM is contingent on the necessary resources being provided to this Local Authority.	Implementation plans are to be developed by Local Authorities. Resourcing of plan implementation is being considered by the relevant authorities
<b>Limerick City Council SH_RBMP_004</b>	The relevant Local Authority in whose functional area the catchments lie and other Government agencies must ensure that all stakeholders comply with the directive	Comments noted and forwarded to the relevant local authorities.
	We would also request that each Local Authority in whose functional area the catchments lie is contacted and requested to enforce the directives for good catchment management and reminded of their obligations in the protection of the River Shannon as an essential Drinking Water Source	
<b>Limerick County Council SH_RBMP_028</b>	Limerick County Council has carried out biological water quality on some waterbodies that have extrapolated status and it is requested that this data be used to establish an actual status.	This comment has been noted and will be forwarded to the EPA for consideration
	If there is a requirement to reduce abstraction rates, the time involved in securing and developing a new WS source is such that the 2015 deadline is unlikely to be met.	Implementation plans are to be developed by Local Authorities. Resourcing of plan implementation is being considered by the relevant authorities
	Ability of any LA to proceed with programees for improvement is constrained by current recession - objectives may need to be reviewed in light of same.	Each of the Plans objectives have been reviewed
<b>MULCAIR COOP SH_RBMP_055</b>	It appears that different County Councils will operate different emphasis on similar issues creating confusion by all partners	Implementation plans are to be developed by Local Authorities in accordance with the WFD - there are management groups in place to deal with and co-ordinate management plan implementation
	Concerned over inspections by LAs who have blamed farmers wrongly in the past over fish kills	
<b>Offaly County Council SH_RBMP_019</b>	Offaly County Council propose the deferral of the adoption of the Plan for at least 1 year to allow for realistic planning and implementation timeframes	Implementation plans are to be developed by Local Authorities in accordance with the WFD. 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.
	The plan should address the resources, financial and human required for implementation	
	The proposal that all basic measures must be fully implemented in County Offaly in order to achieve good status will be excessively onerous on Local Authority resources	
<b>MICHAEL DUFFY SH_RBMP_026</b>	The basic measures required for urban WWTPs will require vast amounts of capital. Clare County Council has shown no appetite for addressing these problems in the good times.	All Local Authorities will be subject to the same compliance assessments carried out by the EPA and other agencies

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	I have absolutely no confidence in Clare County Council's ability to remedy what it is responsible for itself or enforce what the general public is responsible for	
	How will Clare County Council manage with reducing groundwater pollution?	Additional details on the implementation of measures will be available following compilation of the implementation programmes for the Districts.
<b>PATRICK T. FITZGERALD SH_RBMP_029</b>	Rowing club members are on the water constantly and could provide an opportunity for monitoring and sampling	Offer of monitoring programme support passed to EPA for consideration
	It would be interesting to quantify the level of investment from all stakeholders with an interest in the river and to establish best practices where identical tasks are being carried out. It may be possible to pool or share resources to trade tasks where appropriate	This comment has been noted and will be forwarded to the EPA for consideration
	The inland waterways could model itself to a similar or expanded specialist grouping as the Shannon Estuary Anti-Pollution Team (SEAPT) , which is an excellent example of LA grouping with Coast Guard and Harbour Masters for a common purpose and is most effective and well established expert group. Hundreds of years of knowledge and experience exists among the water safety officers and ought to be tapped	
<b>SASKIA DE JONG SH_RBMP_053</b>	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	Classification information has been included in the plan supporting documentation
	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 water bodies where they hold no data at present, and that are not included in the present monitoring programme	This comment has been noted and will be forwarded to the EPA for consideration
	The RBD Management Plans (and www.wfdireland.ie 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>SASKIA DE JONG SH_RBMP_053</b>	The RBD Management Plans (and www.wfdireland.ie 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.	
	The RBDMP must provide full information on monitoring sites and frequencies, and ensure that waters receiving municipal wastewater treatment discharges are continuously monitored	The RBMP does include links to the WFD monitoring programme. The comment has been forwarded to the EPA who are responsible for the monitoring programme.

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	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.	Compliance assessments are carried out by the EPA and other agencies
	A RBD Management Unit is vital for successfully meeting WFD objectives; need to identify who takes responsibility for overall co-ordination between competent authorities and also within each competent authority; Task lists, targets and responsible actors along with resources must be presented	Implementation plans are to be developed by Local Authorities in accordance with the WFD - there are management groups in place to deal with and co-ordinate management plan implementation
<b>SEAN O FARRELL SH_RBMP_064</b>	Expand river rejuvenation programmes and improve/enhance biodiversity within the river corridor	Environmental works programme' under the Programme of Measures will ensure that the measures and controls put in place in order to achieve the objectives of the Water Framework Directive are done so to achieve the required ecological status.
	It seems like a water tax is the best way to achieve efficient use and conservation within the hotels, industry, agriculture and homes	This is proposed as a possible measure
<b>Roscommon County Council SH_RBMP_005</b>	Targets and target dates need to be addressed in the final plan in light of the reductions in resources in the local authority sector, both human and financial	Implementation plans are to be developed by Local Authorities in accordance with the WFD. 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.
	We would emphasise the need for open and transparent prioritisation of resources at national level in order to assist in delivery of the objectives of the RBMP	
	Implementation of measures set out in the draft plan may require the setting up of teams similar to the approach used for waste enforcement measures	
	We are greatly concerned that elected members may not be willing to adopt the plans in Autumn 09 and would welcome any suggestions as to how to obtain their engagement in the process	There will be meetings with the Elected Members in advance of the Plan going to the full Council, at which members will be given detailed briefings on what the Plan means for their area.
<b>WESTMEATH COUNTY COUNCIL SH_RBMP_043</b>	The current economic climate has led to a decline in local Government funding for Local Authorities. This in turn limits a local authorities ability to effectively implement the measures detailed in the RBMP's	Implementation plans are to be developed by Local Authorities in accordance with the WFD. 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.
	The council recommend that a more realistic system to achieve the objectives of Good Water Quality Status may include incremental catchment improvements.	
<b>WESTMEATH COUNTY COUNCIL SH_RBMP_043</b>	In order for a local authority to measure their performance regarding the achievement of the RBMP objectives there is a need for a measurement system.	All Local Authorities will be subject to the same compliance assessments carried out by the EPA and other agencies
<b>WHELAN GROUP LTD SH_RBMP_051</b>	We respectfully request that standardized guidelines in the implementation of the management plan should be drafted prior to the plan being implemented by all Local Authorities	Implementation plans are to be developed by Local Authorities. Resourcing of plan implementation is being considered by the relevant authorities
	The guidelines should also cover the sanctioning of water discharge licenses and planning applications	
<b>CLLR. BRIAN MEANEY SH_RBMP_025</b>	In general I found this plan difficult to comprehend and excessively complicated. While the subject matter is complex, the four tier approach to its presentation did not help. My main source of information was the 100 page booklet which did not give any guidance on using or understanding the water body status maps and the status reports on the website	This comment has been noted. Watermaps has been updated

### 3.2.18 Additional Issues

Organisation	Additional Issues	Responses
<b>AN TAISCE SH_RBMP_049</b>	Turloughs have not been adequately addressed by the Draft Plan, yet they are an important surface water which need to be accounted for more thoroughly throughout the Plan.	The designated sites are included as protected areas and objectives set accordingly
<b>BIRDWATCH IRELAND SH_RBMP_027</b>	Concerned of the lack of emphasis on protection of wetlands.	The designated sites are included as protected areas and objectives set accordingly
	The lack of the use of indicators of biological condition - such as wild birds	This comment has been noted and forwarded to the EPA for consideration
<b>CENTRAL FISHERIES BOARD SH_RBMP_037</b>	Concerned of the lack of emphasis on protection of wetlands.	The designated sites are included as protected areas and objectives set accordingly
	Concerned of the lack of actions to buffer water bodies and wetlands in planning decision-making processes	Controls fall under the existing planning and development control process
	CFB propose that Integrated Constructed Wetlands (ICWs) be considered as a supplementary 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 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.	Additional levels of treatment for these will be considered as measures where appropriate
<b>GSI SH_RBMP_063</b>	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
<b>IFA SH_RBMP_060 SH_RBMP_030</b>	IFA propose the establishment of an environmental works programme for each of the rivers in the ShIRBD to increase river capacity by tree cutting and vegetation growth control and to remove silt in critical areas.	These comments have been noted and forwarded to OPW for consideration under Floods Directive Management Plans
	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.	
	County Councils should replicate other EU countries and pay an annual charge for historical under-investment in water infrastructure.	This comment has been noted and forwarded to the DEHLG for consideration

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Organisation	Additional Issues	Responses
<b>IRISH WILDLIFE TRUST SH_RBMP_041</b>	The benefits of wetland functions are not recognised in the draft Plan and proposed measures to protect them are either missing or inadequate.	The designated sites are included as protected areas and objectives set accordingly
	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 reedbed systems is needed amongst local authorities, planners and environment staff.	Such initiatives are considered as measures
	No elaboration in draft plans of how the Plans will be integrated with the Floods Directive	This is addressed under the links to plans and programme section of the plan
	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 to date however the plan includes existing controls to address this pressure
	Construction of windfarms is a problem for siltation of waterbodies. This issue is not adequately 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
<b>SWAN SH_RBMP_054</b>	Floodplain restoration should be proposed as a measure.	Such initiatives are considered as measures
	The complimentary use of reedbeds for wastewater 'polishing' should be proposed and their wider use researched	
	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 as measures
<b>SWAN SH_RBMP_054</b>	Windfarms are 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
<b>Kerry County Council SH_RBMP_020</b>	The application of a one-out all-out system is, in our opinion flawed.	The EPA is confident that the new status assignment correctly reflects the condition of our waters.
	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.	Freshwater Pearl mussel populations are not reproducing due to unfavourable conditions thought to be water quality related and are considered to be in unfavourable conservation status. Since these mussels are part of the macroinvertebrate community it reflects in the overall moderate classification of the river.
	The final adoption of the plan in its current format would be premature in advance of final publication of the proposed new surface water objectives regulations.	These concerns form the basis for the regular periodic review and updating of the RBMPs as new plans and programmes are finalised, and the RBMP can be updated accordingly.
	In addition to the above, it is likely that competing priorities will also have an impact on full attainment of all objectives.	
<b>BORD NA MONA SH_RBMP_058</b>	It is Bord na Mona's intention to continue to treat surface water runoff from active peat production peatlands under IPPC Licence by the EPA but not on cutaway peatlands after bog rehabilitation has been completed.	IPPC licensing is a matter for the EPA. All licences will be reviewed in light of the new EC Environmental Objectives (Surface Water) Regulations 2009 (SI 272 of 2009)
	Bord na Mona do not believe that the introduction of Emission Limit Values on the IPPC Licence for peat extraction for nutrient emissions is appropriate	IPPC licensing is a matter for the EPA. All licences will be reviewed in light of the new EC Environmental Objectives (Surface Water) Regulations 2009 (SI 272 of 2009)

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	In relation to private peat producers operation on bogs >50 hectares, Bord na Mona agree that these producers should be licensed under the IPPC Licensing system	IPPC licensing is a matter for the EPA. All licences will be reviewed in light of the new EC Environmental Objectives (Surface Water) Regulations 2009 (SI 272 of 2009)
<b>BORD NA MONA SH_RBMP_058</b>	In relation to small private peat enterprises (which include small commercial producers of domestic fuel peat and horticultural peat). It is Bord na Mona's view that these should be subject to an effluent discharge licence under the Local Government (Water Pollution) Acts 1977 and 1990	Effluent Discharge licences issued under the LG (Water Pollution) Acts 1977 and 1990 are a matter for the relevant local authorities. All licences will be reviewed in light of the new EC Environmental Objectives (Surface Water) Regulations 2009 (SI 272 of 2009).
<b>CLLR. CHRISTY CURTIN SH_RBMP_001</b>	In the light of the experience of the exceptional rainfall levels during this 2008 summer and the on-going likely fallout from climate change patterns, I would recommend the preparation of a "Database of the Floodplains, Storm Water Systems and Watercourses serving each settlement and it's catchment area in each Clare Electoral Area as a Core Activity of the Shannon River Basin Plan 2009".	This comment has been noted and forwarded to the relevant authority (Office of Public Works (OPW)). As part of the Shannon Catchment Flood Risk Assessment and Management study the OPW will be identifying areas of potentially significant risk of flooding, including those at significant flood risks from infrastructure such as water supply systems, urban stormwater drainage systems, etc.
<b>CLARE IFA SH_RBMP_033</b>	Clare IFA propose the establishment of an environmental works programme for each of the rivers in the ShIRBD to increase river capacity by tree cutting and vegetation growth control. Clare IFA propose that embankment remedial works should form part of the ShIRBD management plan in areas which are designated as proposed NHA, SAC or SPA.	These comments have been noted and forwarded to OPW for consideration under Floods Directive Management Plans
<b>CLEAN SH_RBMP_046</b>	The draft Plans as published are in our view fundamentally flawed in that they fail to demonstrate a sufficient working knowledge of the existing environment. Again we highlight the difficulties of accessing data and supporting data referenced in the report. In many instances this data does not or did not appear to be finalised and therefore not available for analysis.	This comments has been noted. Final classification will be assigned by the EPA in 2011 in accordance with the recent surface water regulations
<b>IFA OFFALY SH_RBMP_008</b>	IFA propose a maintained drainage programme on the River Shannon to alleviate flooding in farm land	This comment has been noted and forwarded to OPW for consideration under Floods Directive Management Plans
<b>IFA Limerick SH_RBMP_032</b>	Provision must be made for the regular cleaning and maintenance of waterways to ensure that flooding is minimised. A system of independent water testing must be introduced	This comment has been noted and forwarded to OPW for consideration under Floods Directive Management Plans This comment has been noted and forwarded to the EPA for consideration
<b>PETER CROSSAN SH_RBMP_050</b>	All water bodies such as Lough Allen where populations of Fresh Water Pearl Mussels are identified must be treated as Protected Areas and designated at least as NHA or SAC	Designated water containing Freshwater Pearl Mussel are subjected to sub-basin management plans as a priority
<b>South Tipperary County Council SH_RBMP_018</b>	There are 163 no. water bodies in South Tipperary County Council, 60 no. of these water bodies are less than 10km <sup>2</sup> (the smallest is 0.31km <sup>2</sup> ). These should be aggregated as per Chapter 5 of WFD CIS Document No. 2 Identification of Water Bodies.	This comment has been noted and forwarded to the EPA for consideration
<b>KERRY INGREDIENTS SH_RBMP_010</b>	If the 2021 deadline for achieving good status proves to be over-optimistic, given the issues involved, other options will need to be considered, including less stringent objectives or a delayed target date of 2027 for the achievement of good status	All options will be considered during the implementation process
<b>Leitrim Co Co SH_RBMP_021</b>	Need specific references to background documents, not just a link to the website	References to background documents have been up-dated

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<b>Loais County Council SH_RBMP_042</b>	The OPW has a greater role in morphology. The Council are concerned that other bodies may not be able to carry out necessary works	This comment has been noted and forwarded to OPW for consideration under Floods Directive Management Plans
<b>Midlands Gateway CHAMBER SH_RBMP_038</b>	We would further contend that the River Basin Management Plans call for phased national water harvesting schemes and/or schemes involving the reuse of grey water	These are included as a measure
<b>MULCAIR COOP SH_RBMP_055</b>	We request that phase three river should be kept open and capacity up by tree cutting and vegetation growth control until a proper flood relief scheme is carried out as promised	This comment has been noted and forwarded to OPW for consideration under Floods Directive Management Plans
	Cannot understand the reasoning as to why Ireland has adopted a higher water quality status than the UK.	This comment has been noted and forwarded to the EPA for consideration
<b>Offaly County Council SH_RBMP_019</b>	We propose that a single I.T. platform should be used across all RBD's to manage all data and progress reports. This should be linked to both MCEI and EDEN	This comment has been noted and forwarded to the EPA
<b>MICHAEL J. WEBB SH_RBMP_002</b>	I believe the report should include an "hierarchical map" outlining the relative power position of the various "players" in the scheme e.g. European Dept, National Govt Depts, Local Govt Depts, planning depts, monitoring and implementation depts, together with clear indications of how, where and when and to whom ordinary citizens can make representation, when they observe breaches of the management plans	This comment has been noted
<b>B.F. ARTHURE SH_RBMP_006</b>	There is no dedicated monitoring programme for benthic invertebrates in Limerick City. Other biological quality metrics have not been fully intercalibrated and so are excluded. Paradoxically, fish are excluded for the same reason, but the actual report gives a moderate result for fish	The EPA is confident that the new status assignment correctly reflects the condition of our waters. Other biological metrics are still being developed under the WFD and once concluded will be incorporated into the monitoring programme. The moderate result for fish is currently based on the physico-chemical parameters measures which indicates moderately suitable habitat for fish
	As far as I am aware the EPA have not monitored the Shannon at Limerick since 2002	The waterbody at Limerick (called Limerick Dock) was monitored by the EPA during 2006, 2007 and 2008.
	Overall, then, the Shannon RBD applied the term moderate status to water quality in the zone in a colloquial sense and not at all in line with the requirement of Article 8 of the WFD, Annex V, based on empirical data	The EPA is confident that the new status assignment correctly reflects the condition of our waters which are in accordance with Article 8 of the WFD
	What is the status of the two sites at Limerick known as Thomond Baths and Corbally Baths?	The two sites known locally as Thomond Baths and Corbally Baths are not designated bathing areas. Both sites are within the transition water called Limerick Docks (water body code= SH_060_0900) and is classified as Moderate Status
	What is your view about proposals to designate heavily modified and artificial waters?	Designation of heavily modified waterbodies follows methodology developed by a group of member states in addressing hydromorphology pressures. The designation of waterbodies into freshwater or transitional waters was carried out by the EPA in accordance with European guidance. The EPA have included all tidal freshwater zones within transitional water bodies. This is in accordance with the definition of transitional water bodies as provided in Article 2 of the WFD and does not provide the option to designate as 'tidal freshwater zone'. The term "Limerick Dock" is just the title given to that particular transitional water body and does not represent any classification as a dock. The EPA has not yet carried out a Hydromorphology Assessment on this water body.
	As the designation would have come from the Engineering Department of Limerick City Council who don't want to be bothered at all with water quality it would suit them to have the Shannon at Limerick, the tidal freshwater zone, classified as a dock.	

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<b>MICHAEL DUFFY SH_RBMP_026</b>	Believes that LAs will play for time concessions in relation to implementing these plans where they affect their processes while at the same time they will be proactive in insisting that others abide by the rules at whatever costs.	All Local Authorities will be subject to the same compliance assessments carried out by the EPA and other agencies
	I have concerns at the Local Authorities being responsible for monitoring status. I believe that monitoring should be carried out independently	
	I would urge immediate tax allowances for on-site WWTS maintenance	These comments have been noted and forwarded to the DEHLG for consideration
	I would also suggest that any probable future property tax should include allowances against remediation or upgrading work to on-site WWTS, provided this work was pre-designed and certified by a suitably qualified indemnified professional	
On site architects/engineers are the vital link between RBD, EPA, LA and DEHLG and should be seen as facilitators, much the same as the relationship between an individual and their Accountant and Revenue.	This comment has been noted	
<b>WESTMEATH COUNTY COUNCIL SH_RBMP_043</b>	The Plans should include an executive summary that members of the public can understand	This comment has been noted
	Need a measurement system (IT) linked to other relevant systems (MCEI, WSIP, EDEN) allowing LAs to track and review their progress at regular intervals (annually).	This comment has been noted and forwarded to the EPA for consideration
<b>CLLR. BRIAN MEANEY SH_RBMP_025</b>	I am concerned that without identification of the root causes of the reasons for the poor ground water status and an achievable set of measures over a realistic time frame to correct the poor status, the plan will not be taken seriously.	Additional details on the implementation of measures, including cost effectiveness analysis, will be available following compilation of the implementation programmes for the Districts.
<b>SHANNON REGIONAL FISHERIES BOARD SH_RBMP_061</b>	We note however that reference to the Fisheries Acts is significantly absent from the document	This comment has been noted
	The addition of even more legislation will not significantly alter or protect the aquatic environment unless there is a real and sustained commitment from the Government, through the Local Authorities to adequately and robustly enforce the present and new legislation.	Local Authorities recognise the challenge and the necessity of obtaining adequate resources to ensure that existing legislation is enforced. Substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive
<b>Clare County Council SH_RBMP_036</b>	The blanket approach to assignment of the 2015 deadline for achieving "good" status for waters reduces the value of the plan overall	This comment has been noted and will be addressed in the objectives setting process for the final plan
	If development is proposed adjacent to a catchment whose status is defined by extrapolation, or not defined at all - how do we confirm the status of the water body in the short time frame of a planning application	Planning authorities ensure that best practice is adhered to and all relevant risks are assessed when analysing planning applications for developments. The Planning and Development Regulations 2006 require that planning authorities notify and take advice from Regional Fisheries Boards of developments that would involve the carrying out of works in, over, along or adjacent to water bodies and wetlands.
	The Draft Plan, as written, could be used as a reason for not prioritizing investment in a particular area	Additional details on prioritisation, timing and implementation will be available following compilation of the implementation programmes for the Districts.
	The Plan needs to be accessible to developers, staff in all public bodies, vested interest groups, and stakeholders generally to enable scoping of the range of studies which are required for a development	A website was set up for each RBD and is regularly updated, which contains not only the Plans but all relevant supporting documentation, and is accessible to developers, staff in all public bodies, vested interest groups and stakeholders

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<b>IRISH WILDLIFE TRUST SH_RBMP_041</b>	No mention of coastal zone management in the draft Plan which will be required to address the challenges for good ecological status.	Such initiatives are considered as measures.
	No modifications along the coasts are identified in the Draft Plans. This information is held by the OPW.	These 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
<b>SWAN SH_RBMP_054</b>	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
<b>SASKIA DE JONG SH_RBMP_053</b>	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
<b>GSI SH_RBMP_063</b>	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.	This comment has been noted
	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	Transfers between groundwater and surface water have been taken into consideration
	Geothermal energy exploitation is not addressed in the Draft RBMP.	This has not been identified as a significant issue to date
<b>IRISH WILDLIFE TRUST SH_RBMP_041</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)
	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>SWAN SH_RBMP_054</b>	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.
<b>TEAGASC SH_RBMP_022</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>SASKIA DE JONG SH_RBMP_053</b>	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.
<b>CLLR. BRIAN MEANEY SH_RBMP_025</b>	I request the plan to outline what obligations will be placed on owners of existing facilities which may be contributing to the poor status of the ground water	Such obligations are proposed and enforced through the IPPC Licensing process and the Local Government (Water Pollution) Acts.

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<b>Roscommon County Council</b> SH_RBMP_005	Environment SPC expressed concerns in relation to the classification of groundwaters in Co. Roscommon and believes clarity is required on this matter	This comment has been noted and will be reviewed

### 3.2.19 Basic and Supplementary Measures

Organisation	Basic and Supplementary Measures	Responses
<b>AN TAISCE</b> SH_RBMP_049	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 costing of WWTP and on-site system measures has been undertaken
	The Draft Plan has not addressed each Supplementary measure as to how it will be carried out, nor has the Draft Plan indicated which individual water body needs which particular supplementary or basic measure.	Measures have been identified for each waterbody, implementation plans are to be prepared
<b>AN TAISCE</b> SH_RBMP_049	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, further 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
	The Draft Plan signifies the Supplementary 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
<b>CENTRAL FISHERIES BOARD</b>	The basic measures listed 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
	It is not apparent that the use of basic measures on their own will be sufficient.	It is acknowledged that in some cases implementation of the Basic Measures will not be sufficient to guarantee good status in all waterbodies. A suite of measures is included in the Plan to aid in achieving good status where necessary.

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Organisation	Basic and Supplementary Measures	Responses
<b>SH_RBMP_037</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.
	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
	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 measure includes for impassable barriers investigation
<b>CENTRAL FISHERIES BOARD SH_RBMP_037</b>	The maintainance 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.	This comment has been noted and forwarded to the EPA for consideration
<b>DAFF SH_RBMP_016</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 mini catchment programme findings. Measures for High Status and Protected Areas - review controls on use and disposal of pesticides including sheep-dip	The agricultural catchment programme will determine the requirement for measures, however, further measures for agriculture are included in the FPM sub basin plans
	All RBDs - National forestry supplementary measure - reduce pesticide usage	Basic measures include for controls of dangerous substances in all waters
	National forestry supplementary measure - maintain registers of pesticide use	
	National forestry supplementary 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, EP, 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.	

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Organisation	Basic and Supplementary Measures	Responses
	<p>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 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.</p> <p>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 &gt;30cm on drained peats and &gt; 45cm on undrained peats (Hammond, 1979) See Teagasc data set.</p>	
<b>DAFF SH_RBMP_016 continued</b>	<p>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.</p> <p>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></p> <p>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".</p> <p>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.</p> <p>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) 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.</p> <p>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</p> <p>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.</p>	<p>The proposed measures were identified by a Working Group comprising experts from Forest Service, Coillte Teoranta, COFORD, NPWS, EP, 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.</p>

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Organisation	Basic and Supplementary Measures	Responses
<b>EPA</b> <b>SH_RBMP_059</b>	Integration of SEA and HDA recommendations: Indicate in final report how mitigation measures, which were identified in ER and HDA, 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 supplementary 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
	Unique coding system for supplementary measures.	This has been included in the plan
<b>Limerick County Council</b> <b>SH_RBMP_028</b>	SM S1 (limiting or ceasing of leachate imports) needs to be balanced against what happens such leachate if it is not imported	This comment has been noted and forwarded to the EPA for consideration
<b>ESB</b> <b>SH_RBMP_017</b>	The Ardnacrusha Power Plants and its associated 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.	These comments have been noted and will be considered in the implementation of associated measures.
	For Lough Derg (Lower), there is a recommendation regarding gravel loosening or transportation of gravel from behind the dam.... The extraction of such gravel from the rivers would have its own environmental issues to be dealt with. There is also a considerable risk that work done to place gravel downstream of the dams would be destroyed by the first significant floods that occur on the river.	
<b>IRISH WILDLIFE TRUST</b> <b>SH_RBMP_041</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 Supplementary Measures will only be introduced if Basic measures don't deliver good status	Measures are included where appropriate - this includes investigation of the need and effectiveness of measures.
<b>SWAN</b> <b>SH_RBMP_054</b>	Clarify the timing for the introduction of all Supplementary 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 supplementary 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.

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Organisation	Basic and Supplementary Measures	Responses
<b>SWAN SH_RBMP- 054</b>	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 supplementary 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>Animal and Plant Health Association SH_RBMP_009</b>	It would be appropriate that any measures contemplated within the River Basin Catchment Plans be fully discussed and agreed with the relevant competent authority (Pesticide Control Service of the Dept of Agriculture).	All proposed measures will be discussed in detail with all relevant competent authority.
<b>Kerry County Council SH_RBMP_020</b>	There is still some level of uncertainty over the precise measures (in particular which supplementary measures) that may be considered necessary in some areas.	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.
<b>Galway County Council SH_RBMP_065</b>	The council is directing resources into complying with the 11 EU Directives (the Basic Measures) and even for those measures, the capital funding and staff constraints are a cause for concern	These comments have been noted and forwarded to the DEHLG for consideration
	Galway County Council supports the realignment of the Water Services Investment Programme that is required to improve compliance with the Basic Measures	
	Galway County Council will prioritise those measures which maintain good status for the special protected areas (drinking water sources, bathing waters, protected habitats) and which support the economic development of the county.	
	This is an extensive list of measures and Galway County Council is not in a position to generally agree to these measures at present due to budgetary and staff constraints.	
	Some of the measures can be reframed so as to place the responsibility for compliance certification on the owner/occupier rather than enforcement by the local authority.	
	Similarly, the Council cannot commit to enforcing requirements for percolation, instead a self-compliance regulation should be brought in for existing systems	
<b>IBEC SH_RBMP_044</b>	IBEC supports the implementation of the most cost effective measures	These comments have been noted and will be considered in the development of implementation plans
	The financing deficit that government is currently experiencing should not brand certain measures, which until recently were affordable, as disproportionately expensive	
	To ensure maximum value for money any contracts which arise as a result of this cost analysis should be variable to exploit the opportunities arising from falling prices in the economy	
	Business is concerned that proposals for charging may be considered as a revenue raising exercise for local authorities	

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Organisation	Basic and Supplementary Measures	Responses
	<p>Business customers require high quality water supply as a pre-requisite component and aid to operations</p> <p>A more integrated approach to the planning and implementation of capital investment projects is required given the range of planning and investment bodies across sectors</p> <p>IBEC opposes the introduction of charging for water abstraction on the basis that water service authorities have no cost burden to recover where companies are involved in water abstraction</p> <p>IBEC wants local authorities and the government to revisit the issue of water charging to increase efficient use of water and provide revenue to support investment in new and existing infrastructure</p>	
<b>IFA SH_RBMP_060 SH_RBMP_030</b>	No Supplementary Measures for forestry should be introduced unless effect on water quality is known and can be directly related to forestry. IFA recommends further research is required prior to introduction of SMs to determine the impact on water quality.	These comments have been noted and will be considered in the implementation of associated measures.
	IFA strongly opposes 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.	
	RBMPs must not exceed the Nitates Regulations. The draft RBMP has failed to recognise that Ireland adopted a "whole territory" approach. The proposal to introduce "possible supplementary measures" at a later stage ignores this position.	
	IFA propose a three-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.	These comments have been noted and will be considered as possible measures
	IFA propose that DEHLG should establish leakage reduction targets for each LA and highlight the consumer cost reductions, where such reductions take place.	
<b>IFA OFFALY SH_RBMP_008</b>	Westmeath and Offaly IFA Co Executives wish to reject completely the following proposals: Increased inspections by local authorities & the EPA; Creating increased buffer strips; Setting aside land; Reducing stocking density; Reducing levels of land reclamation; Requiring nutrient management planning; Stricter storage or closed periods; Relocation by using digesters in areas of nutrient surplus or tankering in areas of nutrient surplus; New abstraction regulations	These are included as possible measures pending the findings of the agricultural catchment programme studies
<b>KERRY INGREDIENTS SH_RBMP_010</b>	The effectiveness of the programme of measures will need to be monitored on an ongoing basis	Monitoring is included to investigate the need and effectiveness of measures.
	It is recommended that the result of Basic Measure 4 in the RBMP should be changed from Yes to no in relation to the Glen River	All licensed discharges will have to be reviewed in light of the new requirements under the EC Environmental Objectives (Surface Waters) Regulations, SI 272 of 2009. Therefore this Basic Measure 4 (Review existing IPPC license conditions and reduce allowable pollution load) has to remain Yes.

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Organisation	Basic and Supplementary Measures	Responses
	Supplementary Measure 10: relocate the point of discharge for the Glen River catchment should be understood as assessing the feasibility of piping all wastewater from the Charleville area, including that from Kerry Ingredients, to the River Maigue	Relocation of the point of discharge is one option where there is insufficient assimilative capacity in the receiving water body to absorb the loading from the discharge in question. Another option is an increased level of treatment of the wastewater prior to discharge.
<b>SASKIA DE JONG</b> <b>SH_RBMP_053</b>	Clarify the timing for the introduction of all Supplementary 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 supplementary 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
	Need to promote alternative sources of water (e.g. water harvesting) for uses other than human consumption	
<b>SHANNON REGIONAL FISHERIES BOARD</b> <b>SH_RBMP_061</b>	We strongly recommend for all surface waters the establishment of riparian zones between 10 and 30 metres in width depending on the importance of the waters to be protected	The establishment of riparian zones are included as measures
	We are also concerned that development is taking place in advance of the construction or upgrading of important infrastructure such as waste water treatment plants	This is included as part of the Urban Waste Water Discharge Licensing process (appropriate treatment)
<b>Clare County Council</b> <b>SH_RBMP_036</b>	Definition of overall risk and appropriate measures for improvement/protection of waters is difficult to understand i.e. do not appear correct. Requirement for percolation in unsewered properties is not even considered as a SM - this is in conflict with national guidance and best practise. Some measures are untested and may prove time-consuming and unproductive. The draft Plan does not indicate how the changes will be made to the basic and supplementary measures when the status is confirmed	Further update of status and review of measures will be undertaken during reviews which are built into the river basin management cycle

### 3.2.20 Extended Deadlines

Organisation	Extended Deadlines	Responses
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<b>AN TAISCE SH_RBMP_049</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
<b>EPA SH_RBMP_059</b>	Provide Scientific Reasons for seeking derogations in time scale.	The decision making rationale is included in the background documents
<b>Galway County Council SH_RBMP_065</b>	The scale of the cutbacks in public finances and the ongoing reduction in staff numbers will require a longer timescale for components of the Plan.	The decision making rationale is included in the background documents
<b>KERRY INGREDIENTS SH_RBMP_010</b>	Having regard to the present poor condition of the Glen River, and the multiple discharges to it, Kerry Ingredients (Ireland) Ltd supports the revised deadline of 2021 for achieving good status in the Glen River	This comment has been noted
<b>Offaly County Council SH_RBMP_019</b>	Extended deadlines should be proposed in the Plan where allowed by the Directive	To be considered in review of objectives for plan
<b>Clare County Council SH_RBMP_036</b>	The time frame specified for the implementation of actions (with projected improvement in water quality status) actions is aspirational and unrealistic	To be considered in review of objectives for plan
<b>IBEC SH_RBMP_044</b>	IBEC recommends the use of derogations until 2021 or 2027 if it is decided that the measure is disproportionately expensive.	To be considered in review of objectives for plan

### 3.2.21 Integration with other Plans and Programmes

Organisation	Integration with Other Plans and Programmes	Responses
<b>AN TAISCE SH_RBMP_049</b>	Other than a brief mention on page 75 of the Draft Plan, there is no elaboration on how the Plan will be integrated with the Floods Directive. 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.	This comment has been noted. Legislation regarding the floods directive will be introduced in 2009 clarifying the requirements and organisational roles. The DEHLG and OPW will progress these mutual implementation issues
<b>CENTRAL FISHERIES BOARD SH_RBMP_037</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 SHRBD plan should encourage the adoption of similar plans for lakes and waterbodies in the RBD. 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.

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<b>EPA SH_RBMP_059</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 the RBMP
<b>ESB SH_RBMP_017</b>	Due to the complex and interrelated operations of the dams on the River Shannon, ESB requests that it would be given an opportunity to participate in these studies.	This comment has been noted
<b>IRISH WILDLIFE TRUST SH_RBMP_041</b>	Flood Management Plans that are currently being drawn up need to be adequately addressed in the Draft Plan.	These are included in the links to plans and programme section
	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.	The SEA has been carried out in accordance with statutory requirements
<b>OPW SH_RBMP_056</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.	
	OPWs 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.	
	As Ireland has taken minimalist approach to HMWBs 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 role out.	
<b>Animal and Plant Health Association SH_RBMP_009</b>	Were the authors aware of the proposed National Action Plan for sustainable use of Pesticides.	These are included in the links to plans and programmes section of the RBMP
<b>IBEC SH_RBMP_044</b>	All Development Plans must take account of these regional guidelines	These are included in the links to plans and programme section
	River basin objectives will only be achieved if plans and programmes are coordinated and integrated.	Agreed. Included in links to plans and programmes section in the RBMP
<b>Offaly County Council SH_RBMP_019</b>	The implications of the Draft Surface Water regulations should be expressed in the Plan	These are explained in the relevant measures sections
<b>CLLR. BRIAN MEANEY SH_RBMP_025</b>	I request that this plan inform in detail the councillors in these areas what will be required to have consideration to in the drafting or amending of county and local area plans.	Further presentations/briefing sessions for elected representatives will be held prior to the plan going before the Councils for adoption.

### 3.2.22 Website/Watermaps

Organisation	Website & Water Maps	Responses
<b>AN TAISCE SH_RBMP_049</b>	The use of “n/a” on the water maps is ambiguous.	This comment has been noted. Watermaps has been updated
	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.	This Comment has been noted. Watermaps has been updated
	The references within the Draft Plan, which refer to background documents, are often too vague to be useful.	These comment have been noted. The plan contains more detailed linkages to background documents
	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.	
<b>AN TAISCE SH_RBMP_049</b>	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 and forwarded to the EPA who are developing EDEN
<b>CENTRAL FISHERIES BOARD SH_RBMP_037</b>	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.	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 final plans.
	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.wdfish.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.	
<b>IRISH WILDLIFE TRUST SH_RBMP_041</b>	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>Galway County Council SH_RBMP_065</b>	The interactive map available on www.wfdireland.ie is too slow for local authority needs	This Comment has been noted. Watermaps has been updated

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<b>Roscommon County Council</b> SH_RBMP_005	Felt that some clarity needs to be brought to this area over and above the availability of interactive maps which are difficult to access and navigate	This Comment has been noted. Watermaps has been updated
<b>WESTMEATH COUNTY COUNCIL</b> SH_RBMP_043	The Shannon River Basin Management System known as "water maps" is not user friendly, it requires the user to be skilled in the use of IT systems and drill down within the system to extract information	This Comment has been noted. Watermaps has been updated
<b>Clare County Council</b> SH_RBMP_036	Legibility of maps is a problem on the website. Does the button in the middle represent a sampling point or the centroid of the water body.	Neither. Watermaps has been updated
	The definition of overall risk for sub catchments, and appropriate measures for improvement/protection of waters is difficult to understand.	This Comment has been noted. Watermaps has been updated
	The published document does not provide guidance in accessing, using or understanding information on water body status maps in the plan area, or on how to use the reports on water body status	

### 3.2.23 Waterbody Specific Issues

Organisation	Waterbody Specific Issues	Responses
<b>AN TAISCE</b> SH_RBMP_04 9 SWAN SH_RBMP_05 4 SASKIA DE JONG SH_RBMP_05 3	Lough Allen is not subject to the objectives of the Bathing Waters Directive on the watermaps website, yet it contains the Corry strand beach.	L. Allen is not a designated bathing area.
	Lough Allen does not appear to be subject to the Habitats Directive objectives	Lough Allen is not a designated SAC or SPA and is therefore not subject to a Habitats Directive Assessment.
	The water quality on Lough Allen has also suffered from One-off rural housing developments with unsuitable treatment systems, as well as inappropriate activities on the NHA peatlands upstream which is being subject to afforestation then clear felling and wind farm development	Each planning application for one off houses is thoroughly assessed prior to issue of a decision. Installation of a proprietary sewage treatment system rather than a septic tank has been required for many years in Leitrim. A panel of approved assessors for site suitability assessment and design of on site wastewater treatment systems for single houses have been set up in Co. Leitrim since 2007 and their recommendations have been taken on board. Leitrim County Council is currently piloting a reedbed and willow plantation system for single house sewage treatment as an environmentally sustainable option. Forestry development and clearfelling is now controlled by Forestry and Water Quality Guidelines issued by the Forest Service. All wind farms in the lake catchment area have been subject to planning permission and the County Council have applied strict conditions to ensure the highest environmental standards are kept. Leitrim County Council is proactive in the control of development in the Lough Allen area and has produced a Lough Allen Development Plan which is part of the County Development Plan. Furthermore the non renewal of the planning permission and licence for further fish farming activity on the lake is seen as a measure to protect the water quality of this valuable lake resource.
<b>Ballyvaughan</b>	We, as a community, have specific interest in and concern about the status and,	Lickeen Lough is classified as moderate status due to the following status elements:

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Organisation	Waterbody Specific Issues	Responses
<b>Water Committee</b> SH_RBMP_02 4	indeed, the abstraction levels of Lake Licheen at the present time and equally so where the future is concerned. We are also concerned as to what exactly is the status of Lake Licheen water in terms of pollution in raw and filtered state. We are concerned to know when the draft document speaks of the necessity of there being controls for significant surface water and ground water abstractions as to what those controls are in relation to Lake Licheen.	Macrophytes, Nutrients - Total Phosphorus. This is the status of the lake water pretreatment. The draft Plan refers to new regulations being proposed by the DEHLG for controlling abstractions, which would create 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.
<b>BIRDWATCH IRELAND</b> SH_RBMP_02 7	There has been an apparent increase in summer flooding events on the Shannon, with flooding events recorded in five out of the last seven summers, corresponding to a dramatic decline in the corncrake population. The Competent authorities, including the DEHLG and the OPW must produce a plan of action to address these issues, as required by the WFD.	This comment has been noted and forwarded to the DEHLG and OPW.
<b>CLEAN</b> SH_RBMP_04 6	While Lough Allen has been accorded moderate status on the water maps report, it has been pointed out by others that the fish status was classified as poor and therefore this should have indicated a poor status rating for Lough Allen.	The overall status of L. Allen remains Moderate. While you correctly pointed out that the Fish Status was classified as Poor on the Watermaps report for L. Allen, this has been revised but has not been updated on the Watermaps website yet. The reasoning is that Fish Status was originally classified as Moderate using a Fish Classification Tool but Expert opinion downgraded Fish Status to Poor and over-ruled the Tool Classification result. However a review of other indicators (Macrophytes, Nutrients) indicated Moderate Status for L. Allen and this, along with the Fish Classification Tool indicating a Moderate Status, caused a revision of Fish Status and upgrading it to Moderate. Please also note that the One Out All Out principle which was generally adhered to, was overruled by expert opinion in some cases e.g. where the weight of evidence, or lack of, indicated a different status than the worst one.
	The range of pressures on Lough Allen are not comprehensively documented and taken into consideration.	The comprehensive range of pressures include diffuse and point sources and were included following EU WFD CIS guidance. Other pressures that have local or significant water management issues are included in the SWMI document.
	Similarly in the case of Lough Oughter water body the status is listed as moderate when the element description suggest this should be poor.	Lough Oughter is not in the ShIRBD
<b>Peter Crossan</b> SH_RBMP_05 0	The draft report makes no mention of the smolt farm on the lake which is identified in a recent EPA report as contributory factor to deterioration to water quality	The EPA is confident that the new status assignment correctly reflects the condition of our waters. Licensed fish farms are considered under industrial discharge pressures.
	Might we suggest that the plan for Lough Melvin would provide an ideal blue print for Lough Allen regarding meaningful data collection in support of a new draft and final plan for the Shannon IRBD.	The EPA is responsible for the WFD Monitoring programme and this has been designed in accordance with EU guidance on monitoring requirements for the WFD.
	The amount of sampling at Lough Allen and its frequency is sufficient for monitoring purposes and for identification of problems in time to allow mitigation measures be applied	Noted
	A monitoring programme has to be implemented for the smaller tributaries to Lough Allen and other lakes in order to compile a data collection, reflecting climate change implications and human interference within the catchment areas.	The EPA is responsible for the WFD Monitoring programme and this has been designed in accordance with EU guidance on monitoring requirements for the WFD.
	We are concerned about plans by Waterways Ireland to extend the navigable waterway through the Kilgarriff Marsh NHA and the loss of the last natural river of the Shannon through physical modification. Thees plans have already been refused by An Bord Pleanala but local media reports suggest a new application is expected soon.	This comment has been noted. Any proposals will have to ensure that compliance with WFD requirements can be achieved

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Organisation	Waterbody Specific Issues	Responses
<b>Laois County Council</b> SH_RBMP_04 2	Offaly County Council abstract drinking water from the catchment of the River Clodiagh upstream of Clonaslee village. Laois County Council is concerned that this abstraction reduces the flow rate of the River Clodiagh at the discharge point of the Clonaslee Wastewater treatment plant and consequently reduces the assimilative capacity of the river. Laois County Council has no input into the rate of abstraction and therefore feels that there may be a failure to achieve good water quality standard by 2015	The assimilative capacity in the river Clodiagh was checked and found to be satisfactory given the standard of treatment (tertiary) at the Clonaslee WWTP.
<b>Leitrim Co Co</b> SH_RBMP_02 1	Keeldra Lake is a designated bathing water but has not been assigned a lake status SH_26_1632 Loughtownlough, poor status. All other surrounding water bodies have been assigned good or moderate status	These comments have been considered under reviewed objectives in plan Keeldra Lake is not an EPA monitoring lake under the WFD monitoring programme and does not have any status classification assigned.
<b>Limerick City Council</b> SH_RBMP_00 4	We would request that catchment monitoring completed in the area surrounding the Clareville Water Treatment Facility is forwarded to the water producer (Limerick City Council), for our records, any correspondence to the Local Farmers informing them of their obligations under SI 378 of the Nitrates Regulations 2006 and any results of the small streams risk scores	There has been no catchment monitoring or Small Streams Risk Score assessments completed by the respective local authorities in the waterbody surrounding the Clareville Water Treatment Facility
	We would also wish you to consider the location of the Limerick County Council's Castle Connell Foul Waste Pumping station and the proximity of the overflow point to the River Shannon in relation to our abstraction point. Mitigation measures must be put in place to eliminate this potential hazard	The Castleconnell sewage is now pumped to Castletroy. This is a major improvement on the previous situation. Limerick County Council is in discussions with the Limerick City Council to install a SCADA alarm for pump outage to be relayed to the Water Treatment plant at Clareville so that any required changes could take place to the water abstraction/production process. This SCADA alarm is part of a wider sharing of information between the City and County Council. The County Council has in turn requested access to the Clareville SCADA systems and information.
<b>Limerick County Council</b> SH_RBMP_028	The need for extended deadlines in many of County Limerick's waterbodies, particularly in the River Deel Catchment <b>SEE TABLES ATTACHED TO SUBMISSION FOR INDIVIDUAL WATERBODIES</b>	This comment has been considered under reviewed objectives in plan
<b>THOMAS FORDE</b> SH_RBMP_003	At the north end of Lough Allen between the townlands of Ross More and Corry in Co. Leitrim there once stood a fine cut stone pier. Unfortunately, over the year it was vandalised and much of the stone material stolen. The redevelopment of the pier and the improvement of the road in that location would be a great boost for the local people.	This comment has been noted and forwarded to the Local Authority
<b>Clare County Council</b> SH_RBMP_036	Examples given of specific WBs where Clare Co Co assessment differs from that in Watermaps.	This comment has been considered under reviewed objectives in plan
<b>Anonymous</b> SH_RBMP_007	Through Legislation and Regulation the statutory bodies have prescribed the degradation of part of an SPA. The NPWS and DAFF have between them aided the degradation of that which they are charged to protect. The Council and Fisheries Board remained unhelpful and seemingly uninterested. In addition Clare County Council violated its own CDP. Was the Annageeragh River still promoted as an important salmon and trout attraction for visitors at a time when no fish entered or left the Annageeragh River and Lough Donnell? All these State bodies are central to the implementation of the River Basin Plan. Alas, these same bodies have lost the confidence of some.	This comment has been noted

### 3.2.24 Editorial Issues

Organisation	Responses
AN TAISCE SH_RBMP_049	<b>ALL OF THE ORGANISATIONS LISTED ON THIS PAGE SUBMITTED EDITORIAL COMMENTS. FOR FURTHER INFORMATION ON THESE SUBMISSIONS PLEASE CONTACT THE SHANNON IRBD COORDINATOR.</b>
DAFF SH_RBMP_016	
DCENR SH_RBMP_045	
EPA SH_RBMP_059	
IRISH WILDLIFE TRUST SH_RBMP_041	
Galway County Council SH_RBMP_065	
Clare County Council SH_RBMP_036	