

# **Western River Basin District**



## **Digest of Submissions and Responses on the Draft River Basin Management Plan**

**December 2009**

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# **1 Introduction**

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

## **1.1 Background**

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

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

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 all subsequent review of the RBMPs and POMs, as committed to under the WFD, are also subject to SEA.

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

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

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

## 1.2 Consultation and Participation Activities

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

As part of the consultation process a series of public information events were held in Western River Basin District and in neighbouring River Basin Districts. Venues and dates at which they took place are listed below.

**Table 2. Public Consultation Meetings**

### Western RBD

Date	Location	Venue
Monday 27 <sup>th</sup> April	Sligo	Sligo Park Hotel, Pearse Road, Sligo
Wednesday 29 <sup>th</sup> April	Mayo	Regional Training Centre, Castlebar, Co. Mayo
Thursday 30 <sup>th</sup> April	Galway	County Hall, Prospect Hill, Galway

### Shannon IRBD

Date	Location	Venue
Tuesday 28 <sup>th</sup> April	Clare	County Hall, Clare County Council, Ennis
Thursday 7 <sup>th</sup> May	Leitrim	Bush Hotel, Carrick-on-Shannon

### North Western IRBD

Date	Location	Venue
Tuesday 28 <sup>th</sup> April	Donegal	Mount Errigal Hotel, Letterkenny, Co. Donegal
Thursday 30 <sup>th</sup> April	Donegal Town	Mill Park Hotel, Donegal

The information events gave the public and stakeholder groups an opportunity to meet with the project team, collect information on the Western RBD, be introduced to 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.

## 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 were considered during the

development of the final river basin management plan. This digest of submissions and responses is being distributed to those who took part in the process and other interested parties, and will also be available at [www.westernrbd.ie](http://www.westernrbd.ie).

## 2 Summary of Submissions

### 2.1 Submissions

A total of 49 submissions were received, including written submissions, comments and questionnaires. Table 3 lists the organisations that made submissions during the consultation process.

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

Organisation	Submission Number
An Taisce	W_RBMP_033
An Taisce Galway	W_RBMP_020
Birdwatch Ireland	W_RBMP_010
Brian Curran	W_RBMP_009
Carra Mask Corrib Water Protection Group	W_RBMP_019
Carra/Mask Angling Federation	W_RBMP_046
Central Fisheries Board	W_RBMP_023
Clare County Council	W_RBMP_030
Clare County Council (Economic Development and Planning Strategic Policy Committee)	W_RBMP_042
Coillte	W_RBMP_034
Con McCole	W_RBMP_012
DAFF	W_RBMP_015
DCENR	W_RBMP_031
Department of the Environment, Heritage and Local Government	W_RBMP_021
Environmental Protection Agency	W_RBMP_040
Failte Ireland	W_RBMP_028
Galway County Council	W_RBMP_041
Geological survey of Ireland (GSI)	W_RBMP_036
IBEC	W_RBMP_032
ICMSA	W_RBMP_048
Irish Farmers Association (IFA)	W_RBMP_043
IFA Connacht	W_RBMP_002
IFA Galway	W_RBMP_007
Independent Farmers Federation (IFF)	W_RBMP_029
Industrial Heritage Association of Ireland	W_RBMP_047
Irish Concrete Federation	W_RBMP_026
Joseph Yeomans	W_RBMP_018
Ken Irvine	W_RBMP_008
Lakeside Estate Residents Association	W_RBMP_006
Leitrim County Council	W_RBMP_016
Lough Mask Angling Club	W_RBMP_003

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Organisation	Submission Number
Mary Gallagher-McBride	W_RBMP_014
North Western Regional Fisheries Board	W_RBMP_013
OPW	W_RBMP_045
Oughterard Anglers Association	W_RBMP_035
Oughterard Angling Club	W_RBMP_024
Residents and Landowners Committee, Creevagh Cong (RLCCC)	W_RBMP_001
Roger P Thomas	W_RBMP_025
Shay Murtagh	W_RBMP_049
Sligo County Council	W_RBMP_005
Sligo County Council	W_RBMP_027
SWAN	W_RBMP_037
Teagasc	W_RBMP_017
The Heritage Council	W_RBMP_011
Tim Gleeson	W_RBMP_038
Tom Rogers	W_RBMP_004
Waterways Ireland	W_RBMP_044
Western Regional Fisheries Board	W_RBMP_022
Western Regional Fisheries Board	W_RBMP_039

## 2.2 Topics Covered

Issues raised in written submissions, questionnaires and comments received were abstracted and were collated in accordance with Table 4.

**Table 4. Submission Topics**

Topic 1	Waste Water Industrial Discharges
Topic 2	Landfills, Quarries, Mines and Contaminated Land
Topic 3	Agriculture
Topic 4	Wastewater from unsewered properties
Topic 5	Forestry
Topic 6	Usage and Discharge of Dangerous Substances
Topic 7	Physical Modifications
Topic 8	Abstractions
Topic 9	Climate Change
Topic 10	Aquaculture
Topic 11	Invasive Alien Species
Topic 12	Protecting High Quality Areas
Topic 13	Cruising, Boating & Recreation
Topic 14	Shared Water Issues
Topic 15	Public Participation
Topic 16	Economics
Topic 17	Implementation
Topic 18	Additional Issues
Topic 19	Basic & Supplementary Measures
Topic 20	Extended Deadlines
Topic 21	Integration with other Plans and Programmes
Topic 22	Website/Watermaps

Topic 23	Water Body Specific Issues
Topic 24	Editorial Issues

### 3 Issues Raised and Responses

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

Table 5 briefly summarises the broad categories of comment received and outlines the general nature of the response.

**Table 5. Summary of Public Participation Key Submissions and Responses**

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

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Comment	Response
of interest in accessibility of background information and mapping further reinforced the need for ongoing support to public information programmes and tools.	measures.
<b>Comments on economics:</b> The economics theme attracted comment regarding the need to set out economic information on selecting measures and extending deadlines but also for the need to consider grant incentives, water pricing and funding of the programme of measures. Water charging was identified as an economic measure in submissions to all districts.	<b>Response:</b> Costing of wastewater and on-site system measures has been undertaken for all water management units. The plan clarifies the recent proposals on water pricing policy and also confirms that economic analysis has not been used to extend deadlines for the final plan.
<b>Comments on enforcement:</b> The enforcement issue generated a number of comments about the implementation of the plan and programme of measures. In particular organisation arrangements for river basin district management were highlighted.	<b>Response:</b> Implementation responsibilities and the role of the National Advisory Committee have been updated in the final plan.
<b>Comments on clarity of measures:</b> Numerous submissions were made regarding the programme of measures. The submissions were largely supportive of the measures but many organisations found it difficult to identify which measures applied to which waters by when (that is to “quantify” the programme)	<b>Response:</b> Further development of public participation tools, particularly the preparation of Water Management Unit Action Plans, has been undertaken to provide more clarity at this level of detail.
<b>Comments on level of ambition:</b> Numerous submissions were also made regarding the objectives, with the level of ambition of the plan either considered too high or too low depending on the view of the consultee (for example, Fisheries, Local Authority or Non Governmental Organisation). In particular concerns were raised about realistic timeframes for improvements of less than good waters to take place due to physical recovery or practical constraints. The timescales required for waters supporting protected area interests were also highlighted for further consideration in several submissions.	<b>Response:</b> Detailed technical studies have reviewed these issues providing scientific data to determine cases where time extensions in objectives are necessary. Extended deadlines have been identified for water bodies where appropriate.
<b>Comments on integration with other plans:</b> The section about integration of plans and programmes also raised several comments with suggestions of links to additional plans.	<b>Response:</b> Where appropriate these have been added to the register of linked plans and programmes.
<b>Comments on monitoring and classification:</b> There were a significant number of comments about the monitoring data and classification	<b>Response:</b> These have been drawn to the attention of the relevant agency (mainly the Environmental Protection Agency or DEHLG -

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Comment	Response
process.	National Parks and Wildlife Service). Changes in water status in some water bodies has occurred as a result of comments made.
<b>Editorial Comments:</b> Editorial comments or corrections were submitted by several parties.	<b>Response:</b> Where appropriate these have been included in the final plan.

### 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 & Industrial Discharge

Organisation	Wastewater & Industrial Discharge	Responses
<b>CENTRAL FISHERIES BOARD</b> <b>W_RBMP_023</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</b> <b>W_RBMP_050</b>	Prioritised list of UWWTPs for each RBD, that require upgrade or improved operation, to be listed with indication of completion date.	A prioritised national list has been prepared for the Water Services Investment Programme following discussions with the Local Authorities which reflects the requirements of the RBMP. More detail is provided in the Water Management Unit documents which accompany the Final Plan as an Appendix.
<b>IFF</b> <b>W_RBMP_029</b>	Request for all local authorities elected members to have the application of all municipal sludge on lands banned. Why has the Food Safety Authority taken so long in having the risk analysis of land spreading of human excrement carried out. Pathogenic micro-organism and heavy metal and chemical contamination of sewage treatment methods needs to be evaluated. DEHLG administrative problems have resulted in delays to the EU Sewage Sludge Directive update and revision.	RBMP requires compliance with all basic measures including the Sewage Sludge Directive and Regulations. Under this directive land banks used for sludge spreading must be monitored for a range of parameters including heavy metals.

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Organisation	Wastewater & Industrial Discharge	Responses
<b>North Western Regional Fisheries Board</b> W_RBMP_013	Lack of enforcement of National and EU regulations has resulted in non compliance with basic measures under the UWWTD.	<p>Discharges from UWWT plants are now licensed by the EPA with emphasis on maintenance, operation and upgrading where necessary to comply with discharge license conditions.</p> <p>Plants identified as being deficient in terms of impact on water quality have been identified nationally under the POMs study on Municipal and Industrial Regulation (<a href="http://www.wfdireland.ie">www.wfdireland.ie</a>) and appropriate measures identified. UWWT plants requiring capital works have been notified to the DEHLG for inclusion on the Water Services Investment Programme.</p>
<b>SWAN</b> W_RBMP_037	No new development should be permitted unless adequate sewage treatment capacity is in place before permission is granted	This is already included as a measure
	For new settlements, isolated gated communities and other isolated commercial developments, waste treatment facilities must not be permitted to discharge to watercourses but should be impounded and transported direct to wastewater treatment plants.	This is included as part of the Urban Waste Water Discharge Licensing process (appropriate treatment)
	DEHLG must resource sewage treatment capacity to handle the additional load created by requirements to desludge septic tanks.	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 an EPA study 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>Con McCole</b> W_RBMP_012	Inadequate and overloaded municipal sewerage treatment works in many of the WRBD towns and villages continues to pose a serious and on-going threat to the water quality	This has been recognised by all relevant authorities. Water bodies at risk from UWWT plants have been identified in the RBMP
	The fact that the local authorities are in themselves polluters reflects very badly on their mandate as protectors of the waters. If they are to gain respect for their role as protectors of the waters, they must firstly set their own house in order	Resources are committed to ensure local authorities have the resources to implement the requirements of the Water Framework Directive

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Organisation	Wastewater & Industrial Discharge	Responses
<b>CARRA / MASK ANGLING FEDERATION</b> W_RBMP_046	How can interested parties assess risks when no details of IPPC licence discharge points, or other discharges is given in the draft plan or on the watermaps site	Requests can be sent to the EPA and Local Authorities for information relating to the IPPC and Local Authority discharge licenses. Watermaps has been updated. Information can also be obtained from the POMS study on Municipal and Industrial Regulation ( <a href="http://www.wfdireland.ie">www.wfdireland.ie</a> )
<b>Western Regional Fisheries Board</b> W_RBMP_022	The Plan is not very specific in terms of listing of particular wastewater treatment plants for upgrading or replacement	More detailed information in relation to the listing and upgrading of the wastewater treatment plants is provided in the Water Management Units which accompany the Final Plan as an Appendix..
	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. A revised Water Services Investment Programme has been prepared which takes account of the requirements of the RBMP, NPWS and EPA in terms of level of treatment.
<b>Ken Irvine</b> W_RBMP_008	My understanding is that WWTP already have to comply with the Urban Waste Water Directive and that there already has been an extensive upgrading of plants. If there have been failures to date in implementing this directive, surely it does not need further Action Plans to implement existing policies	The Urban Wastewater Treatment Directive forms an important part of the WFD's basic measures. UWWTP are now also licensed by the EPA. In some cases operational aspects have been identified as requiring improvements.

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

Organisation	Landfills, Quarries, Mines	Responses
<b>AN TAISCE</b> W_RBMP_033	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
<b>SWAN</b> W_RBMP_037	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 for (contaminated lands) and the Code of Practice (landfills). Information is available from the relevant authorities, including sites such as illegal landfills where remedial actions are already undertaken
<b>ICF Irish Concrete Federation</b> W_RBMP_026	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.

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Organisation	Landfills, Quarries, Mines	Responses
	Transfer of groundwater to surface water sources might incorrectly be deemed an abstraction.	The quantitative status of groundwater considers these abstractions.
<b>Con McCole W_RBMP_012</b>	The regulation of quarries and sand/gravel pits should be entrusted entirely to the EPA which is an independent body due to possible conflicts of interest for local authorities	This comment has been noted and forwarded to the EPA for consideration
<b>Ken Irvine W_RBMP_008</b>	Page 10, surely the wording should be "further measures" and an acknowledgement of past failings	This comment has been noted

### 3.2.3 Agriculture

Organisation	Agriculture	Responses
<b>AN TAISCE W_RBMP_033</b>	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 Good Agricultural Practice Regulations are identified as basic measures within the plan and the GAP agricultural catchment programme will identify the role of agricultural measures.
	A low cost/no cost advisory service that provides good information to farmers would be an extremely useful initiative to be developed	
	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.	
	Alternative disposal mechanisms for slurry (and municipal sludge) other than land spreading need to be provided.	
	For farms in REPS there should be more emphasis on minimising slurry production and less on support for slurry storage.	
	Additional financial incentives, such as bonuses, must be provided to encourage and promote environmentally sensitive farming.	
	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	
	Slurry spreading (volume and inappropriate practices) must be reduced and controlled through the establishment and proper enforcement of appropriate agricultural bye-laws,	
	Bio-digesters should be able to handle excess slurry waste	
	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.	
Controls should be placed on the amount of fertilisers that can be purchased		

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Organisation	Agriculture	Responses
	The REPS scheme should have more measures integrated with it to help protect water bodies.	
	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.	Release of polluting material to waters is governed by basic measures including Water Pollution and Good Agricultural Practice Regulations
<b>CENTRAL FISHERIES BOARD W_RBMP_023</b>	There are fears that the slurry storage periods prescribed in the Good Agricultural Practise Regulations, 2009 will not be adequate in order to fully protect important salmonid waters.	The Good Agricultural Practice agricultural catchments projects will evaluate this issue
<b>DAFF W_RBMP_015</b>	The listing of 'over-grazing remediation' for consideration as a supplementary measure in respect of agriculture is inappropriate in view of the fact that DAFF has worked closely with the National Parks and Wildlife Service in the preparation and publication of Commonage Framework Plans.	This has been included in the measures. Responsibilities have not yet been determined
<b>EPA W_RBMP_050</b>	Programme for Farm Inspections for West should be set out.	This issue of farm surveys is an implementation issue and is being considered by the relevant Government Departments.
<b>THE HERITAGE COUNCIL W_RBMP_011</b>	Suggest that DAFF undertake a programme to rehabilitate rivers affected by overgrazing, while also ensuring there are sufficient direct measures in place to reduce over-grazing itself.	This has been included in the measures. Responsibilities have not yet been determined
<b>IFA W_RBMP_043</b>	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 W_RBMP_048</b>	ICMSA strongly believe that there should be only one set of regulations and inspections under the Nitrates Regulations and that under no circumstances should any further supplementary measures be placed on the sector.	This issue of farm surveys is an implementation issue and is being considered by the relevant Government Departments
	ICMSA think it is crucial that all bodies are cognisant of the period involved in achieving measurable benefits in terms of the effectiveness of the National Action Programme.	Work to evaluate the scientific basis for efficacy of measures and lag-time for recovery in water quality has been completed to support extended deadlines for some water bodies impacted by agriculture in the final RBMP. Extended deadlines for water bodies have been identified on mapping in the Final RBMP.

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Organisation	Agriculture	Responses
<b>North Western Regional Fisheries Board</b> <b>W_RBMP_013</b>	Clarification requested on inspections to be carried out on farms by DAFF and the Local authorities.	At national level DAFF will carry out agricultural farm inspections on 1% of all farms in the country. These will focus on areas where water body status is identified as less than good. Where water pollution issues are identified by the DAFF inspections the relevant information will be passed to the local Authorities for follow inspection and action as appropriate.
	The benefit of any proposed update of the Good Agricultural Practice Regulations will be very much dependent on number of inspections and results and a more rigid timeframe and regime of inspections is required to ensure effectiveness of the GAP.	The issue of farm surveys is an implementation issue and is being considered by the relevant Government Departments. However, agricultural catchment studies under the GAP are being undertaken to assess the effectiveness of the GAP programme in improving water quality. The outcome of these will feed into any future modification of the GAP.
	Suggest use of digestors at strategic locations to recycle agricultural by products.	the Gap Regulations are the basic agricultural measure. Measures may be considered following the GAP agricultural catchment study programme.
<b>SWAN</b> <b>W_RBMP_037</b>	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> <b>W_RBMP_017</b>	Concern that 'lag time' between implementation of agri-environmental measures and improvement of water quality, is not sufficiently accounted for, the RBPMs may prematurely accommodate the implementation of unnecessarily stringent supplementary measure for the agriculture sector.	Work to evaluate the scientific basis for efficacy of measures and lag-time for recovery in water quality has been completed to support extended deadlines for some water bodies impacted by agriculture in the final RBMP. These are clearly identified on mapping 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>Tim Gleeson</b> <b>W_RBMP_038</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>Joseph Yeomans</b> <b>W_RBMP_18</b>	My main concern is about run off from farms into water supplies. Nothing much seems to be done	Gap Regulations are basic agricultural measure

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Organisation	Agriculture	Responses
<b>IFA_GALWAY W_RBMP_007</b>	The use of sludge as a fertiliser on agricultural land for the production of food should be banned immediately	RBMP requires compliance with all basic measures including the sludge directive
	We totally reject any proposal to prevent farmers from using watercourses for livestock under REPS	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 agricultural measures
<b>Con McCole W_RBMP_012</b>	I would respectively suggest that a protective buffer zone be provided around all water bodies. Farmers should be compensated for the resultant loss of productivity from such zones	Comment noted..
	It is my opinion that in order to protect water resources all such sludges should be treated, (as through anaerobic digestion or similar process), prior to land spreading	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 supplementary agricultural measures
<b>Western Regional Fisheries Board W_RBMP_022</b>	There are fears that the slurry storage periods prescribed in the Good Agricultural Practise Regulations, 2009, will not be adequate in order to fully protect important salmonid waters.	The GAP agricultural catchments projects will evaluate this issue
	Over grazing is an issue affecting some of the regions more important game fisheries	This has been recognised in measures
<b>Ken Irvine W_RBMP_008</b>	Grassland farming provides the majority of nutrient pollution to Irish surface and groundwater's. This should be openly stated	These comments have been noted The GAP agricultural catchments projects will evaluate this issue
	In terms of "Background" it is at low flows that the problem generally manifests in rural areas	
	I note that if GAP is not effective then there will be the need for supplementary measures	
	Without adequate checking it will never be known if the Good Agricultural Practice are implemented	

### 3.2.4 Wastewater from Unsewered Properties

Organisation	Wastewater from Unsewered Properties	Responses
<b>AN TAISCE W_RBMP_033</b>	The Western Draft Plan needs to specifically address the issue of contamination through private waste water systems not working efficiently.	The Final Plan indicates that new Regulations for onsite wastewater treatment systems maintenance and management will be introduced in 2010
<b>SWAN W_RBMP_037</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. New onsite wastewater treatment systems must comply with the new EPA Guidelines on Single House Treatment 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. This will also be considered in proposed new Regulations on

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Organisation	Wastewater from Unsewered Properties	Responses
		onsite wastewater treatment systems
	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 unduly pressure on companies doing site assessments.	This is included in the measures
<b>IBEC W_RBMP_032</b>	IBEC considers it vital that diffuse discharges from agricultural sources and wastewater from unsewered properties are targeted to ensure the achievement of the WFD	This comment has been noted.
<b>Leitrim County Council W_RBMP_016</b>	Number of unsewered properties identified for Co. Leitrim is considered excessive given the overall population of the County. Recommend that this be re-assessed.	Determined through use of An Post Geo Directory and mapping of sewerage systems. Update to An Post data in July 09 revealed less properties due to invalid entries (approx 3000). The On-Site study had since been updated based on these changes.
<b>North Western Regional Fisheries Board W_RBMP_013</b>	Without a statutory basis proposed measures for unsewered properties will not be effective. Effective enforcement is also required.	The Final RBMP indicates that new onsite wastewater treatment systems must comply with the new EPA Guidelines on Single House Treatment Systems. For existing systems the Final Plan states that the Minister (Environment, Heritage and Local Government) proposes to introduce new regulations in 2010 to address the issue of suitability, operation and maintenance of these.
<b>Con McCole W_RBMP_012</b>	All of the local authorities in the WRBD should come to grips with this problem by enacting effective bye-laws similar to those which have been adopted by Cavan Co. Council	Consideration of bye-laws is an issue for individual local authorities. The Final Plan indicates that new Regulations for onsite wastewater treatment systems maintenance and management will be introduced in 2010
<b>Roger P. Thomas W_RBMP_025</b>	There should be a treatment plant built on the end of the existing Septic Tanks and the owners should have a grant to get the works carried out	For existing on site wastewater treatment systems the Minister (Environment, Heritage and Local Government) proposes to introduce new regulations in 2010 to address the issue of suitability, operation and maintenance of these. The issue of providing grant aid for private dwellers has been raised with DEHLG for its consideration.

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Organisation	Wastewater from Unsewered Properties	Responses
<b>Sligo County Council</b> <b>W_RBMP_027</b>	Other stipulated measures should include: the publishing of the codes of practice for single houses and large systems; certification of the installation of onsite WWTS; training on their installation and maintenance; setting up a national group for formulating polices and coordination of the implementation; setting up a technical advice section or advisory group; enforce requirements for de-sludging and implementation of codes of practice; public education on the importance of maintenance of OSWWTP	<p>This comment has been noted and forwarded to the EPA for consideration.</p> <p>The Final RBMP indicates that new onsite wastewater treatment systems must comply with the new EPA Guidelines on Single House Treatment Systems</p>
	Clarification is needed on what "Enforce requirements for percolation" means	This comment has been noted and clarified
	There is an urgent need to have a national system for the installation, certification, maintenance and management of onsite wastewater treatment systems	This comment has been noted and forwarded to the EPA for consideration
	The issue of upgrading existing OSWWTP and funding for the upgrades needs to be addressed nationally	<p>The issue of providing funding for upgrades has been raised with DEHLG for its consideration.</p> <p>The Final Plan indicates that new Regulations for onsite wastewater treatment systems maintenance and management will be introduced in 2010</p>
	The disposal of septic tank sludge needs to be addressed nationally	The Sewage Sludge Regulations & the GAP Regulations are included as basic measures
<b>CARRA / MASK ANGLING FEDERATION</b> <b>W_RBMP_046</b>	In the western region of County Mayo there is a requirement for proprietary treatment systems in all new one-off housing. This should be mandatory in all areas	<p>This comment has been noted and forwarded to the DEHLG for consideration.</p> <p>The Final RBMP indicates that new onsite wastewater treatment systems must comply with the new EPA Guidelines on Single House Treatment Systems</p>
<b>An Taisce Galway</b> <b>W_RBMP_020</b>	Single house developments in the countryside, particularly those near rivers and lakes, should no longer be tolerated	<p>This comment has been noted and forwarded to the DEHLG for consideration.</p> <p>The Final RBMP indicates that new onsite wastewater treatment systems must comply with the new EPA Guidelines on Single House Treatment Systems</p>

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**3.2.5 Forestry**

Organisation	Forestry	Responses
<b>AN TAISCE W_RBMP_033</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 aeroplanes through licensing regulations is a welcome step, it is An Taisce's position that it should be totally prohibited.	This comment has been noted
	The current approach of the Draft Plan to apply more stringent measures in the most sensitive areas is 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> ). Ongoing research into Forestry and water may identify additional measures for forestry management.

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Organisation	Forestry	Responses
	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
	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>CENTRAL FISHERIES BOARD W_RBMP_023</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>COILLTE W_RBMP_034</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 trialed out at a catchment scale to determine their effectiveness. Some further research is being undertaken under the HYDROFOR and other 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	

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Organisation	Forestry	Responses
	<p>S6: More practical alternative would be to determine the percentage of a WB that can be felled over a three year period rather than capping the felling coup size.</p>	
	<p>S7: The best time to restructure a forest stand is after 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.</p>	
	<p>S8: Under current Coillte Best Management Practice, the drainage network of a stand is reviewed as part of the Environmental Impact Assessment prior to harvesting and subsequent re-stocking. Consideration is given to the best measures to be adopted to minimise the impact on the receiving local water body (ies) during and after the forest operations. This document is under constant review at this time and subject to alteration, change and further addition as the forest operations progress and additional protection measures are identified, implemented and documented.</p>	
	<p>S9: This measure should merged with <b>S10, S11 and S23</b> and form part of an Integrated Pest Management plan for each Forest Property, including delaying re-stocking by 3 to 5 years (fallowing), use of pre-dipped plants, reduced pesticide usage and experimenting with alternate biological control methods.</p>	
	<p>S12: This issue could be addressed if the location of the impacted water bodies were made known to Coillte and could be included in the relevant Forest Management Plans. Consideration should also be given for the relaxing of the Forest Service regulation of re-stocking sites within two years of felling to up to five years to facilitate greater diversity in age classes in the forest stand.</p>	
	<p>S13: Coillte would have serious reservations on the efficacy of the above measure to mitigate impacts in acid sensitive areas. The long-term benefits of liming Irish waters has not been demonstrated and thus would be of little use to the Forest Manager/Practitioner in buffering acid sensitive waters. Arising from the uncertainties surrounding this measure, it should be omitted from the suite measures and subject to further research.</p>	
	<p>S14: Similar to S13, this measure warrants further</p>	

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Organisation	Forestry	Responses
	<p>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>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 W_RBMP_015</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 than those envisaged by the draft RBMPs.</p>	This comment has been noted
	<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>	The draft plan acknowledges the necessity to focus on issues, however background documents set out the benefits of such activities.

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Organisation	Forestry	Responses
	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.	This comment has been noted
	The Directive adopts a coordinated approach towards good water quality. However, the draft management plans place little emphasis on a more coordinated approach towards achieving its effectiveness – it seems that each pressure is taken in isolation.	Coordination is taken as an overall theme in the action plan following identification of the individual issues and their measures.
	This latter is compounded by the fact that the management plans and their measures are not subject to an economic analysis that would enable prioritising measures on the basis of their value for money/resources and their effectiveness. The draft plans are less than complete for this reason.	The Final RBMP indicates that compliance with existing Basic Directives is key to achieving the required water quality status. Basic Directives must be complied with and cost effective analysis is not required for their implementation.
	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.	
	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.	This is the role of a high level implementation group  Monitoring will be undertaken by the EPA, fisheries, Marine Institute and Local Authorities in accordance with the National WFD Monitoring Programme ( <a href="http://www.epa.ie">www.epa.ie</a> )
	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.	

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Organisation	Forestry	Responses
	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, EP, 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 trialed 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. Background documents into the programme of measures development for forestry are available on <a href="http://www.wfdireland.ie">www.wfdireland.ie</a>
<b>EPA W_RBMP_050</b>	RBD specific forest coverage stats should be included in each plan.	This comment has been noted
<b>IFA W_RBMP_043</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 Habitants Directive (Freshwater Pearl Mussel) in the forest sector.	This comment has been noted.
<b>North Western Regional Fisheries Board W_RBMP_013</b>	NWRFB highlight the lack of enforcement and the need to compel operators to comply with the Forest Service Code of Practice and Guidance documents.  NWRFB identifies the requirement to replant clearfelled areas under the existing forestry Act as a significant issue to be addressed particularly on unsuitable sites.	The 1946 Forestry Act has been under review for some time and this issue is under consideration. The Minister has the power under the existing Act to waive the requirement for replanting. The new proposed Forestry Bill includes provisions relating to water protection including ensuring all operations are carried out in accordance with any guidelines and regulations issued by the Minister for Agriculture, Fisheries and Food and also allowing change of land use to from forestry to other sustainable use.  Compliance with the requirements of the Aerial Fertilisation Regulations is the measure identified to control aerial fertilization.

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Organisation	Forestry	Responses
	NWRFB question the adequacy of control of aerial fertilization of forest stands.	
<b>SWAN W_RBMP_037</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 has the power under the existing Act to waive the requirement for replanting. The new proposed Forestry Bill includes provisions relating to water protection including ensuring all operations are carried out in accordance with any guidelines and regulations issued by the Minister for Agriculture, Fisheries and Food and also allowing change of land use to from forestry to other sustainable use.
	Enforcement of Code of Good Practice as mandatory	
<b>TEAGASC W_RBMP_017</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.
	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.
	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	Noted, although in some instances establishment of broadleaves in the aquatic zone may prove challenging.

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Organisation	Forestry	Responses
	are more nutrient demanding) in the aquatic zone.	
	Proposals to limit drainage should only be made on the basis of relevant research and should take the financial, practical and health and safety consequences into account. Few species will tolerate limited drainage which results in reduced crop productivity, excessive windblow and dangerous and inaccessible forests.	Limitation of drainage refers mainly to a move away from the type of drainage systems utilised pre 1990 after which the guidelines were introduced. Where buffer zones are been established there should be no drainage directly to watercourses and overland flow should be the preferred option.
<b>Con McCole W_RBMP_012</b>	The immediate cessation of all planting of alien coniferous trees on peat uplands	These comments have been noted and forwarded to the EPA for their consideration
	The removal of all immature alien conifer plantations from peat uplands	
	The careful clear felling of strip of mature alien conifer trees along all waterways in order to create buffer zones which should be left for three years to vegetate followed by the progressive clear felling of the remainder of the forest	
<b>Sligo County Council W_RBMP_027</b>	Forestry needs to be controlled as a matter of urgency and monitoring needs to be carried out on sites where forestry operations are being carried out	This is included within the plan
	Consideration given to introducing environmental legislation to regulate forest developments	A new Forestry Bill, replacing the Forestry Act, is currently being drafted
<b>Oughterard Angling Club W_RBMP_024</b>	The ploughing of peat-lands for planting releases silt to adjacent waterbodies	These comments have been noted
	Spreading rock-phosphate and nitrogen have catastrophic effects on waterbodies	
	The pine needles raise the acidity of receiving water bodies	
	Chemicals are applied in forestry practices to protect the growing trees	
	Clear felling operations have a detrimental effect on the environment	
<b>An Taisce Galway W_RBMP_020</b>	Clear felling is still taking place in Freshwater Pearl Mussel catchments despite the moratorium issued by the Department of Agriculture. Yet no action appears to be taken against the perpetrators of such breaches	This comment has been noted and forwarded to the EPA and DAFF. In some cases clearfelling has been agreed with NPWS in these catchments.

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Organisation	Forestry	Responses
<b>Western Regional Fisheries Board</b> W_RBMP_022	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> )

### 3.2.6 Usage and Discharge of Dangerous Substances

Organisation	Usage and Discharge of Dangerous Substances	Responses
<b>CENTRAL FISHERIES BOARD</b> W_RBMP_023	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>SWAN</b> W_RBMP_037	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.
	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>Leitrim County Council</b> W_RBMP_016	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>North Western Regional Fisheries Board</b> W_RBMP_013	Despite the upper reaches of the river Deel being in very good condition with healthy populations of the Freshwater Pearl Mussel the entire river length is classed as Fail due to a chemical failure at one location. This should be reviewed.	The EPA updated water body status for the Final Plan. Only the lower section of the river Deel is now indicated as failing status due to an exceedence of the average annual concentration for polyaromatic hydrocarbons.
<b>Mary GallagherMacBride</b> W_RBMP_012	The use of Aluminium Sulphate (a toxic chemical) must be discontinued by all Local Authorities and a non-toxic alternative introduced	This comment has been noted and forwarded to both the EPA and DEHLG for consideration
<b>Sligo County Council</b> W_RBMP_027	The inclusion of a point which covers the collection of household hazardous chemicals	This comment has been noted and forwarded to both the EPA and DEHLG for consideration

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Organisation	Usage and Discharge of Dangerous Substances	Responses
<b>CARRA MASK CORRIB WATER PROTECTION GROUP W_RBMP_019</b>	Simple measures which should be cost neutral such as reducing the amount of phosphates allowed in detergents and other household cleaners and chemicals are not mentioned	This comment has been noted and forwarded to both the EPA and DEHLG for consideration. The plan highlights the existing initiative on P free detergents

### 3.2.7 Physical Modifications

Organisation	Physical Modifications	Responses
<b>THE HERITAGE COUNCIL W_RBMP_011</b>	Historical modifications to our waterbodies. It may arise that there are conflicts between the needs of aquatic biodiversity and those of the cultural heritage in the “impassable barriers remediation scheme”. These should be dealt with on a case by case basis	Additional measures may be needed to restore good status to waters impacted by historical morphological schemes - this will be dealt with on a case by case basis. Restoration measures are being considered as part of the measures and controls required by Article 11(3) of the WFD to ensure that the hydromorphological conditions are consistent with the achievement of the required ecological status.
	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>North Western Regional Fisheries Board W_RBMP_013</b>	Measures needed for overgrazing	Water bodies impacted by overgrazing leading to significant physical change are identified in the detailed Water Management unit Action Plans appended to the Final RBMP
<b>SWAN W_RBMP_037</b>	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

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Organisation	Physical Modifications	Responses
		due regard to the downstream effect of the proposal on hydrology and flow patterns.
	Clarification on the treatment proposed for culverts is requested - Will they be retained or removed to restore streams	Physical Modifications Measure includes for impassable barriers investigation in 951 waterbodies in the WRBD 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.

### 3.2.8 Abstractions

Organisation	Abstractions	Responses
<b>AN TAISCE W_RBMP_033</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	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.
	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 W_RBMP_031</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 W_RBMP_050</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 acknowledged in the plan.
<b>THE HERITAGE COUNCIL W_RBMP_011</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.

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Organisation	Abstractions	Responses
<b>IFA W_RBMP_043</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 passed to the relevant authority for consideration
<b>IFF W_RBMP_029</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 of to control impacts of abstractions. Measures and controls to ensure that abstractions conditions are consistent with the achievement of the required ecological status have to be established in response to Article 11(3) of the WFD.
<b>SWAN W_RBMP_037</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.  A definition of “significant” abstractions must be provided and justified.  Recharge data must be ascertained and available for each abstraction proposed.	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.
<b>Shay Murtagh W_RBMP_049</b>	Rainwater harvesting should be promoted.	This is included as measures for abstractions
<b>Sligo County Council W_RBMP_027</b>	There must be national direction taken on the abstraction of water from aquifers	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.
<b>CARRA / MASK ANGLING FEDERATION W_RBMP_046</b>	Lough Mask is set to supply nearly 2/3 of the drinking water in Mayo, yet it is not listed as being a protected area under the Drinking Water Directive. The threats from abstraction have not been identified or addressed within the Draft Plan.	This comment has been considered under reviewed objectives in the plan

### 3.2.9 Climate Change

Organisation	Climate Change	Responses
<b>AN TAISCE W_RBMP_033</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
	Climate change dealt with in a reactive manner instead of proposing pro-active strategies to increase resilience of ecosystems, for example wetlands, and societies. There is a failure to identify and promote the functions of wetlands, for example in controlling pollution and flooding.	Wetlands will be considered as a possible measure under the morphology issue.
<b>CENTRAL FISHERIES BOARD W_RBMP_023</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 an 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 prepared in parallel with the draft and final plans. The SEA is published on the <a href="http://www.wfdireland.ie">www.wfdireland.ie</a> website
<b>EPA W_RBMP_050</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 W_RBMP_028</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 W_RBMP_011</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>SWAN W_RBMP_037</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	An update on climate change has been included in the plan

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Organisation	Climate Change	Responses
	change for the aquatic environment and a summary of measures for each SWMI, to address these implications.	
<b>Tom Rogers W_RBMP_004</b>	The plans response to possible climate changes is acknowledged in a limited way	An update on climate change has been included in the plan
<b>An Taisce_Galway W_RBMP_020</b>	It is noted that there is a small reference to Climate Change in the draft plan. This issue will need to have more prominence in the final edition.	An update on climate change has been included in the plan
<b>Ken Irvine W_RBMP_008</b>	What serious attention has been so far paid to planning for climate change with respect to implementation of the WFD in Ireland?	An update on climate change has been included in the plan

### 3.2.10 Aquaculture

Organisation	Aquaculture	Responses
<b>AN TAISCE W_RBMP_033</b>	Aquaculture still not adequately addressed within the Draft Plan. 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 W_RBMP_015</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	This comment has been noted

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Organisation	Aquaculture	Responses
	Alien Species.	
<b>IFA W_RBMP_043</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 have been prepared (17 in the WRBD).
<b>North Western Regional Fisheries Board W_RBMP_013</b>	Plan fails to address the issue of potential impacts on water quality from aquaculture.	Pressure from aquaculture on water body status has not been fully characterised and will be addressed in future plans.
	NWRFB recognizes the importance of aquaculture activities such as oyster and other shellfish farms which require good water quality and their needs should be addressed in the RBMP	Clear targets for water quality in bays and Shellfish designated areas have been established under the EU Shellfish Waters Directive 'as transposed by S.I. 268 of 2006 and as amended by S.I. 55 of 2009' to ensure no bay falls below criteria for water quality. Pollution reduction plans for each of the 63 designated shellfish waters in Ireland have been prepared (17 in the WRBD).
<b>SWAN W_RBMP_037</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.

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### 3.2.11 Invasive Alien Species

Organisation	Invasive Alien Species	Responses
<b>AN TAISCE W_RBMP_033</b>	The issue of invasive species has 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 threat 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 W_RBMP_023</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 water bodies 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 W_RBMP_050</b>	Invasive alien species of particular concern in each RBD and 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 W_RBMP_011</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 being made available to address the issue through research and the development of action plans to both control and eradicate invasive species in Ireland.
<b>Industrial Heritage Association of Ireland</b>	IHAI express concern that the industrial heritage such as mill related waterworks could be impacted by measures under the R/BMP to restore river structure.	Good practice measures are set out in the Programme of Measures – technical studies on Freshwater morphology ( <a href="http://www.wfdireland.ie">www.wfdireland.ie</a> ). Fisheries Boards have been recommended to undertake barrier studies on rivers to develop a baseline for assessment of potential impact. Potential barriers to fish movement would be assessed on a case by case basis during the implementation phase of the RBMP. The implementation programme will be drawn up by the Local authorities in conjunction with the River Basin Management Committee.
<b>North Western Regional Fisheries Board W_RBMP_013</b>	Plan should include recommendation/requirement for a prohibition on the sale of alien species to minimize risk of getting in to waterways.	An action to introduce new regulations to control introduction or possession of any species of flora or fauna is included in the background documents. Regulations are currently being drafted to effect this.
<b>Western Regional</b>	Recommended consideration be given to the Bio-	Reference to the Bio-security Plan for Lough

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Organisation	Invasive Alien Species	Responses
<b>Fisheries Board W-RBMP_039</b>	security Plan for Lough Mask in the Final RBMP	Mask has been made in the section on alien species in the Final RBMP.
<b>SWAN W_RBMP_037</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.	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>Galway County Council W_RBMP_041</b>	In the section relating to time scales the plan indicates that it will be possible for all lakes to obtain good status by 2015 but I understand that this will not be possible for lakes with alien species	This comment has been considered under reviewed objectives in the plan
<b>Con McCole W_RBMP_012</b>	The daunting task of ridding Lough Corrib of the invasive alien species plant <i>Lagrosiphon major</i> is a matter which should be given priority by the local authorities of the WRBD	This task is being under taken by the CFB, the WRFB and the OPW as a EU Life+ Project which commenced in January 2009
<b>Oughterard Anglers Association W_RBMP_035</b>	There is no clear plan on how to deal with <i>Lagrosiphon</i>	This task is being under taken by the CFB, the WRFB and the OPW as a EU Life+ Project which commenced in January 2009. The purpose of this study is to develop alien species actions plans for their control and eradication.

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Organisation	Invasive Alien Species	Responses
<b>CARRA MASK CORRIB WATER PROTECTION GROUP W_RBMP_019</b>	Protecting our water bodies from alien species require a higher priority at local and national level	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.
<b>An Taisce_Galway W_RBMP_020</b>	It would appear that no budget is being allocated to Fisheries Boards to help them deal with the proliferation of Invasive Curly Pondweed	This task is being under taken by the CFB, the WRFB and the OPW as a EU Life+ Project which commenced in January 2009. The purpose of this study is to develop alien species actions plans for their control and eradication.
<b>Ken Irvine W_RBMP_008</b>	Under "Invasive species" much stronger action is required. The action plan mentioned is weak to say the least	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 need for a ban on potentially invasive alien aquatic plants is an obvious step	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.
	Prevent boat movements into unimpacted lakes	This comment has been noted and forwarded to the EPA for consideration
	Does the WRBD have any powers outside national legislation, or pending national legislation to introduce local regulations on restriction of alien species	The WRBD does not have powers to introduce local regulations in this matter. The Minister for the Environment intends to amend the Wildlife Act to introduce restriction on the import and sale of identified alien species.

### 3.2.12 Protected High Quality Areas (FWPM)

Organisation	Protected High Quality Areas (FWPM)	Responses
<b>BIRDWATCH IRELAND W_RBMP_010</b>	Concerned of the lack of consideration of national and local priority species, habitats and sites including previously proposed NHAs, wetlands beyond the boundaries of designated sites etc.	The location and protection of these sites will be integrated into Local Authority Plans and Programmes. Since all sites have not yet been identified and mapped by NPWS a recommendation is being made that NPWS develop an online database of these sites, regularly update it and provide such updates to Public Authorities and other statutory bodies. The implementation of Local Biodiversity Action Plans would give particular cognisance to the importance of conserving wetland areas at the local level and through development control and control of illegal dumping on such sites.
<b>CENTRAL FISHERIES BOARD W_RBMP_023</b>	<p>The adoption of program of measures that are focused on a single species and that fail to take into account the complexity and interaction with other species are more likely to fail. In this respect, pearl mussel management plans in the absence of salmon management plans fall into this category.</p> <p>Until scientific research indicates otherwise, equal weighting, in terms of sensitivity should be afforded to early life stages of salmonids and early life stages of the pearl mussel.</p>	These comments have been noted and forwarded to the DEHLG
<b>EPA W_RBMP_050</b>	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 W_RBMP_011</b>	Hopes that local authorities will endeavour to increase their ecological expertise and capacity in order to deliver such a commitment, to ensure their compliance with the Birds and Habitats Directives, and to ensure water quality standards are reached. Contributing resources to the implementation of Local Biodiversity Action Plans (where developed) should also help to deliver on this commitment, as would giving particular cognisance to the importance of conserving wetland areas at the local level and through development control and control of illegal dumping on such sites, to maintain their contribution to water quality management.	In recent years many local authorities have broadened the range of professional staff employed by them, in particular in the environmental and natural heritage area, such as ecologists, biologists, agricultural scientists, heritage and biodiversity officers. However, this is not the case in all local authorities.
<b>IFA W_RBMP_043</b>	IFA proposes that additional measures must not be imposed on the farming community until the reasons for FPM failing to reproduce are identified. IFA proposes that detailed research is conducted to evaluate the social, economic and environmental cost of implementing the land sterilisation measures proposed, in advance of their implementation.	This comment has been forwarded to DEHLG for consideration during FPM Sub basin plan preparation. These sub basin FPM Management Plans have now been published on the <a href="http://www.wfdireland.ie">www.wfdireland.ie</a> website.

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Organisation	Protected High Quality Areas (FWPM)	Responses
<b>Western Regional Fisheries Board</b> W_RBMP_022	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.	This comment has 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 salmonids and early life stages of the pearl mussel.	
<b>Ken Irvine</b> W_RBMP_008	The Action Plan for the protected areas is woeful. Protected Areas require site-specific monitoring and management, rather than the laissez faire approach that has been allowed.	This comment has been noted and forwarded to the DEHLG  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. There are specific plans and programmes to address protected area compliance under the relevant legislation
	I would contest very seriously the contention that Basic Measures will be enough to achieve protected areas objectives	

### 3.2.13 Cruising, Boating and Recreation

Organisation	Cruising, Boating and Recreation	Responses
<b>DCENR</b> W_RBMP_031	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</b> W_RBMP_028	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</b> W_RBMP_037	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.

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Organisation	Cruising, Boating and Recreation	Responses
<b>Ken Irvine W_RBMP_008</b>	Cruising and boating should include an Action on boat movements and dangers of alien species introductions	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.

### 3.2.14 Shared Water Issues

Organisation	Shared Water Issues	Responses
<b>AN TAISCE W_RBMP_033</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.	This has been addressed as an action theme within the plans, the DEHLG has established a high level WFD implementation group with representatives from relevant authorities.
<b>Ken Irvine W_RBMP_008</b>	I would suggest that there is not enough joined up thinking - e.g. integration of planning depts, commitment from LA's, engagement among Agriculture, EPA and NPWS, lack of political commitment, lack of resources, etc.	This has been addressed as an action theme within the plans, the DEHLG has established a high level WFD implementation group with representatives from relevant authorities.

### 3.2.15 Public Participation

Organisation	Public Participation	Responses
<b>CENTRAL FISHERIES BOARD W_RBMP_023</b>	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>SWAN W_RBMP_037</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

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Organisation	Public Participation	Responses
	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>Clare County Council W_RBMP_042</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>Galway County Council W_RBMP_041</b>	The Action Plan should include owners/landowners where relevant as responsible bodies.	This comment has been noted. The appropriate level and means of engagement will be considered in the implementation process
<b>Tom Rogers W_RBMP_004</b>	Interested parties have by and large responded but not the general public. In order for any positive movement the public at large must buy into this plan	An awareness programme is included as a measure.
<b>Sligo County Council W_RBMP_027</b>	There is a need for increased national and local education/awareness programmes in relation to a wide range of issues	An awareness programme is included as a measure.
<b>CARRA / MASK ANGLING FEDERATION W_RBMP_046</b>	The general public think that the WFD is an issue only for Local Authorities, the EPA and similar relevant agencies, not for them	An awareness programme is included as a measure.
<b>CARRA MASK CORRIB WATER PROTECTION GROUP W_RBMP_019</b>	Public participation is requested but in general all the relevant documentation is geared towards the professionals (local authorities/EPA, etc.)	An awareness programme is included as a measure.
	It is our view that public participation be expanded and strengthened as this plan is rolled out	
<b>Western Regional Fisheries Board W_RBMP_022</b>	Despite efforts at public education, there is a general lack of awareness of the WFD, its implications and the role the different agencies will play	An awareness programme is included as a measure.
	The fisheries board through its normal promotional channels and its educational programme for schools could assist in getting the message across to the public	This comment has been noted and will be considered during the implementation process
<b>Ken Irvine W_RBMP_008</b>	Public awareness is important but there needs to be a better and certainly more diverse approach	An awareness programme is included as a measure.

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**3.2.16 Economics**

Organisation	Economics	Responses
<b>AN TAISCE W_RBMP_033</b>	Information regarding proposed budgets is deficient.	Costing of wastewater and on-site system measures has been undertaken for all water management units. The plan clarifies the recent proposals on water pricing policy and also confirms that economic analysis has not been used to extend deadlines for the final plan. The resourcing of plan implementation is being considered by the relevant authorities who will produce implementation programmes.
	The Draft Plan appears to have been drafted in the absence of any economic analysis. Any economic information has only been made available in the background documents. The Plan must include informative and comprehensive economic analysis.	
	The Draft Plan needs to carry out an ecological cost benefit analysis as required by Article 5 of the WFD and include it within the Plan, not the background documents.	
	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.	
	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	
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.		
<b>EPA W_RBMP_050</b>	Clarification of Disproportionate cost test and status of various economic tests on supplementary measures.	Costing of wastewater and on-site system measures has been undertaken for all water management units. The plan that confirms that economic analysis has not been used to extend deadlines for the final plan.
<b>IFF W_RBMP_029</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>SWAN W_RBMP_037</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	Costing of wastewater and on-site system measures has been undertaken for all water management units.
	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	This has been included as a measure

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Organisation	Economics	Responses
	charging options, taking into account social justice issues, with full public participation, water charging	
<b>Clare County Council</b> W_RBMP_042	Members expressed their concerns in relation to any price increases in respect of water, particularly for businesses	This comment has been noted
<b>IBEC</b> W_RBMP_032	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 lead 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.	Costing of wastewater and on-site system measures has been undertaken for all water management units.
	IBEC considers it vital that thorough and transparent cost effectiveness studies are completed with real options to chose 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>Ken Irvine</b> W_RBMP_008	My understanding is that costing techniques, especially externalities, that have been used are fairly basic. What techniques for example have been used to cost the value of an SAC, or an Arctic Charr population	Costing of wastewater and on-site system measures has been undertaken for all water management units.

### 3.2.17 Implementation

Organisation	Implementation	Responses
<b>AN TAISCE</b> W_RBMP_033	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 background documents. 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
	A large portion of the waters within the Western Draft Plan have not had each of the different statuses established yet. 26.6% of coastal waters and 23.5% of estuaries still need their surface ecological status to be determined; while 97.5% of rivers and canals, 98.6% of lakes and reservoirs and 100% of estuaries	

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Organisation	Implementation	Responses
	and coastal waters all need to have their chemical status determined.	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.
	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.	
	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.	

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<b>BIRDWATCH IRELAND</b> <b>W_RBMP_010</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
	Concerned about the lack of defined appropriate timescales and targets for actions	Objectives have been established in the plan for all waters. Implementation programmes are to be developed by the relevant authorities
	Concerned for the lack of actions to buffer water bodies and wetlands in planning decision-making processes	The planning process is addressed under the links to plans and programmes section
<b>CENTRAL FISHERIES BOARD</b> <b>W_RBMP_023</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</b> <b>W_RBMP_015</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</b> <b>W_RBMP_040</b>	Western 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>North Western Regional Fisheries Board</b> <b>W_RBMP_013</b>	Special provision should be made for the carrying out of physical enhancement works aimed at improving fish habitat.	Implementation programmes are to be developed by the relevant authorities in the basin and such provision could be include din these programmes through the RBD Management Committee.
<b>SWAN</b> <b>W_RBMP_037</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 plans supporting documentation

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	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 <a href="http://www.wfdireland.ie">www.wfdireland.ie</a> website) must provide accurate mapped data on known discharges to water, including all licensed discharges and other known pollution sources and related information.	Additional information and explanatory text has been included in the updated Watermaps tool
	Detailed legends explaining all terms, the presence or absence of all categories (or risk, measure, etc.), the meaning of classifications (“good” and “poor”, etc.) must be included in the <a href="http://watermaps.wfdireland.ie">http://watermaps.wfdireland.ie</a> website.	
	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.
	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 W_RBMP_017</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
	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 <sup>-1</sup> 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 <sup>-1</sup> for lowland rivers, 40 µg L <sup>-1</sup> for highland rivers and 120 µg L <sup>-1</sup> for rivers with high alkalinity (>50 mg L <sup>-1</sup> CaCO <sub>3</sub> )	
	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	

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	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).	The plan acknowledges that the agricultural catchment programme will determine the requirement for measures for agriculture however such measures are included in appropriate circumstances in the FPM sub basin plans
	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>Clare County Council</b> <b>W_RBMP_030</b>	There is no clear statement of the Tier1-4 constituent parts of the Plan in the booklet presented for public consultation, or what exactly constitutes the River Basin Plan, the defining overarching goal and objectives to achieve the goal of improvement and protection of all water quality	The main document represents the plan with supporting information contained in the background documents and electronic tool (watermaps).
	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	These comments have been noted
	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	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 <i>Margaritifera margaritifera</i> 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. Specific sub basin FPM Management Plans have been prepared and are published on <a href="http://www.wfdireland.ie">www.wfdireland.ie</a> .
<b>Clare County Council</b> <b>W_RBMP_042</b>	Members expressed their concerns in relation to the expense and level of co-operation required in the implementation of the Plan.	Substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive

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<b>Galway County Council</b> <b>W_RBMP_041</b>	Galway County Council is focusing its resources on those actions that deliver the greatest degree of protection of water resources	Substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive.  The Forward of the Final RBMP highlights the resource issue.
	At present Galway County Council cannot assent to certain of the proposed objectives due to financial and staffing constraints	
	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.
	It would be beneficial if further information could be provided in relation to some of the actions required	
	There are several mentions of an Environmental Services National Training Group; however, it was not possible to find any details in relation to this group	This comment has been noted and forwarded to the EPA and DEHLG
<b>IBEC</b> <b>W_RBMP_032</b>	IBEC wants reassurance that appropriate stakeholder interaction takes place post-consultation to ensure transparency	These comments have been noted and forwarded to the EPA for consideration
	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>Leitrim County Council</b> <b>W_RBMP_016</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. The Final RBMP includes a Forward which highlights this issue.
<b>Waterways Ireland</b> <b>W_RBMP_044</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 and will be considered in the implementation process.
<b>Tom Rogers</b> <b>W_RBMP_004</b>	The plans have been produced on a regional (river basin) basis so it would appear a regional authority with sole responsibility for water matters would achieve the most positive results	This comment has been noted and forwarded to the EPA for consideration
	The plan was also proposed before the current financial crisis. This will impose certain restrictions on the desirable aspects of the plan but should not restrict the essential aspects of the plan	

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Organisation	Implementation	Responses
<b>Brian Curran W_RBMP_009</b>	I refer to pages 66/67 of your report and would agree with the supplementary measures being proposed and would like to see a specific plan for the forest at Cloose which is the headwaters of the Boluisce system, and a timescale for the implementation of the 23 action points	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>Sligo County Council W_RBMP_027</b>	It is crucial that Local Authorities are given adequate guidance, training and staff in order to implement the measures detailed in the management plan	This comment has been noted and forwarded to the DEHLG. Substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive. The Final RBMP includes a Forward which highlights the resource issue.
<b>Oughterard Anglers Association W_RBMP_035</b>	There is no clear plan to implement corrective actions	Implementation plans are to be developed by Local Authorities
<b>CARRA / MASK ANGLING FEDERATION W_RBMP_046</b>	The draft plan does not set out what is planned to do in detail to deliver the objectives by 2015	Measures have been identified for each waterbody and the implementation plans are to be prepared by the local Authorities. More detailed measures are included in the Water Management Unit documents accompanying the Final Plan.
	There is little in the draft plan to give confidence that the existing legislation will be enforced properly	Local Authorities recognise the challenge and the necessity of obtaining adequate resources to ensure that existing legislation is enforced.
	There are waters where their status is unknown? How can you plan effective actions for these waters when the status is unknown	Final classification will be assigned by the EPA in 2011 in accordance with the recent surface water regulations. However, basic measures can be implemented which will improve water quality prior to status assignment
	Local Authorities are unable to carry out work because of the lack of funding from the DEHLG.	This comment has been noted and forwarded to the DEHLG. Substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive
<b>CARRA MASK CORRIB WATER PROTECTION GROUP W_RBMP_019</b>	No specific actions are outlined in the plans just broad targets	Measures have been identified for each waterbody and the implementation plans are to be prepared
	A number of the water bodies have yet to be assessed particularly all the coastal regions and monitoring ground water levels much to be desired	Final classification will be assigned by the EPA in 2011 in accordance with the recent surface water regulations.
	No projects are described or costed, i.e. bringing unsewered properties up to standard or major waste water treatment for all small and medium settlements	Measures have been identified for each waterbody and the implementation plans are to be prepared by each Local authority.

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Organisation	Implementation	Responses
	The future management of water is not discussed just a large number of official bodies who have some responsibilities for aspects of water management. No overall direction is apparent	
<b>An Taisce Galway W_RBMP_020</b>	The EPA has stated that almost a third of our rivers and streams are polluted. Yet there is almost no attempt made to prioritise the solutions and to make it clear what the solutions are	Additional details on the prioritisation of measures, timing of implementation, technical feasibility, as well as cost effectiveness analysis, will be available following compilation of the implementation programmes for the Districts.
<b>Western Regional Fisheries Board W_RBMP_022</b>	The fisheries service is willing to assist with the implementation of the programme of measures as far as practicable as in many respects  In order to ensure consistency and uniformity of approach, training courses in relation to farm inspections should be available to fisheries personnel  Necessary to continue to undertake the necessary surveys in order assign a typology classification to all lakes within the RBD.	These comments have been noted and forwarded to the EPA for consideration
<b>Ken Irvine W_RBMP_008</b>	I recommend an Environmental Management System is instigated  There is little new here and it remains to be seen if the new parts (e.g. farm monitoring) will be implemented effectively  There is no mention of the River Basin Management Projects  Are the authorities up to the task, with the necessary expertise and is there a commitment to adequate resources, and training	These comments have been noted and forwarded to the EPA for consideration  These comments have been noted and forwarded to the EPA for consideration

### 3.2.18 Additional Issues

Organisation	Additional Issues	Responses
<b>AN TAIISCE W_RBMP_033</b>	Turloughs have not been adequately addressed by the Draft Plan, yet they are important surface waters which need to be accounted for more thoroughly throughout the Plan.	Designated sites are included as protected areas and objectives set accordingly.
<b>BIRDWATCH IRELAND W_RBMP_010</b>	Concerned of the lack of emphasis on protection of wetlands.  The lack of the use of indicators of biological condition - such as wild birds	Designated sites are included as protected areas and objectives set accordingly  This comment has been noted and forwarded to the EPA for consideration

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Organisation	Additional Issues	Responses
<b>CENTRAL FISHERIES BOARD</b> W_RBMP_023	Concerned of the lack of emphasis on protection of wetlands.	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
	No reference to Integrated Constructed Wetlands (ICWs) in the Draft Plan. They propose that ICWs be included as a supplementary measure in the Draft Plan and be considered as a final stage polishing treatment for effluents and wastewaters that have been firstly treated in a secondary treatment system.	Integrated constructed wetlands are considered as a possible measure in appropriate locations
<b>GSI</b> W_RBMP_036	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.	This comment has been noted and forwarded to the EPA and NRA for consideration
<b>IFA</b> W_RBMP_043	IFA propose the establishment of an environmental works programme for each of the rivers in the WRBD 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 and NPWS
	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.	
<b>SWAN</b> W_RBMP_037	Floodplain restoration should be proposed as a measure.	Such initiatives are included as measures in the plan. Reedbeds 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 in the plan as a measure
	Windfarms are not addressed in the Draft Plan.	Wind farms fall under the existing planning and development control process
<b>Clare County Council</b> W_RBMP_030	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

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Organisation	Additional Issues	Responses
	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, and to ensure that existing rights of way and access are maintained.
	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	Planning authorities ensure that best practice is adhered to and all relevant risks are assessed when analysing planning applications for developments. 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
<b>Galway County Council W_RBMP_041</b>	It is difficult to check whether all of the public drinking water sources are included as there is no reference to the supply	This comment has been noted and forwarded to the EPA. The database of drinking water abstractions has also been circulated to all Local Authorities for verification prior to the Final Plan.
<b>Con McCole W_RBMP_012</b>	The local authorities of the WRBD should move to have household detergents banned	This comment has been noted and forwarded to the DEHLG for consideration
<b>Sligo County Council W_RBMP_027</b>	Design, installation & maintenance details for reed beds and wetlands need to be agreed nationally and guidance issued to Local Authorities	This comment has been noted and forwarded to the DEHLG for consideration
<b>Oughterard Anglers Association W_RBMP_035</b>	The key contributors to pollution have not been identified by order of their impact on water quality	The identification of the key contributors to water quality has been done on a waterbody by waterbody basis and have been included in the plan
	The test methods used to establish the data collected are questionable	The EPA is confident that the new status assignment correctly reflects the condition of our waters.
<b>CARRA / MASK ANGLING</b>	The compound effect of many of the challenges for water bodies are not adequately addressed	The compound/cumulative effects have been addressed in the SEA Environmental Report.

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Organisation	Additional Issues	Responses
<b>FEDERATION W_RBMP_046</b>	Monitoring and sampling locations, methods and frequency need to be made clear, justified and consulted on	These comments have been noted and forwarded to the EPA. 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 a greater explanation of status.
	The Local Authorities enforcing the rules on themselves is inappropriate	This comment has been noted and forwarded to the EPA for consideration
<b>CARRA MASK CORRIB WATER PROTECTION GROUP W_RBMP_019</b>	Just as with other environment directives, enforcement is not given a high priority	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
	The number and positioning of these monitoring sites is at the direction of the EPA with no local input or assistance. Some of the data used to measure risk and status is possibly out of date	These comments have been noted and forwarded to the EPA for consideration. Monitoring sites set out in the National WFD Monitoring Programme were identified by individual expert groups for surface rivers, lakes,
	The public should be aware of the detail of various discharges and abstraction licences issued to local authorities by the EPA	
	The local authority is a major polluter of our waterbodies but is also to be there manager and protector. This is a conflict of interest	
	The question of water pricing is not mentioned or discussed	This is included in the plan
<b>An Taisce_Galway W_RBMP_020</b>	Water charges will have to be introduced but be equitable and socially just	This comment has been noted and forwarded to the DEHLG for consideration
	The draft plan does not really target the causes of pollution.	These are targeted through the implementation of both the basic and measures
	It is also necessary to monitor plans for say, the Galway City Outer by-pass	This comment has been noted and forwarded to the DEHLG for consideration
<b>Department of the Environment Heritage and Local Government Developments Application Unit W_RBMP_021</b>	Submission referred to the Strategic Environmental Assessment of the River Basin management Plans and Programmes of Measures for the Western RBD. Recommended inclusion of National Monuments (Amendment) Acts 1930-2004 in review of legislation, plan, policies and programmes. Recommend inclusion of Shipwreck Inventory of Ireland and the Ports and Harbours Archive in	The comments have been noted for inclusion in the Final SEA.

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Organisation	Additional Issues	Responses
	environmental baseline and also used to identify potential impacts on these sites	
<b>Western Regional Fisheries Board W_RBMP_022</b>	There is a need to review the existing consultation framework as the river basin plans go from adoption to implementation phase.	This comment has been noted and forwarded to the EPA and DEHLG for consideration
	The draft plan understates the importance of fisheries. Furthermore the issue of factors external to the River Basin District that effect migratory fish leaving and returning to the catchment needs to be considered.	These comments have been noted and forwarded to the EPA for consideration
	It is Important that the underlying tabular data that is the basis of the Plan be made available to the Fisheries Service to foster mutual understanding and interpretation of key issues	
	For rivers that are currently of high or good status, the objective should be to contain any increase in mean or 95%ile MRP levels rather than simply fall within the limit values specified.	The Plan acknowledges the important work been undertaken to combat the spread of Alien Species such as the curly leaved pondweed in Lough Corrib and the Zebra mussel. It also acknowledges the Western Regional Fisheries Board Bio security Plan for Lough Mask catchment.
	The Lough Mask biosecurity Plan is now being rolled out and the WRBD plan should encourage the adoption of similar measures for other salmonid lakes in the region.	
<b>Ken Irvine W_RBMP_008</b>	There are only two Artificial Waters in the WRBD and the Cong canal is usually dry. The proposed objectives cover the entire plan, so why (ignoring the misnomer of the Cong canal) provide this early emphasis on water bodies that either don't exist or occur in the WRBD only as a single water body?	This was intended to simply clarify at an early stage that HMWB or Artificial waterbodies are subject to a different set of standards.
	What you actually refer to in Step 1 on Page 7 is the limited public consultation process	Step 1 is not limited to page 7 and continues on the subsequent pages and provides a description of what are the key issues <u>including inputs from the consultation process</u>
	It is simply misleading to suggest that monitoring across all water bodies is comprehensive	Classification information has been included in the plans supporting documentation and it covers a more comprehensive set of parameters than considered to date. It is recognised in the plan that the monitoring and classification process is not yet complete and will continue to develop and build extensive data sets
	Where there is sufficiently high risk, prohibit building in floodplains, taking into account possible wetter winters owing to climate change	This is addressed under the Floods Directive and floodplains guidance
	Is there any example where non-agency consultation led to either the inclusion of a variable/parameter or monitoring location	This comment has been noted and forwarded to the EPA
	The statement that most surface waters have passed the chemical status, misleads about the effects of nutrients.	The ecological classification includes the assessment of nutrients. Chemical status relates to the EU WFD annex 10 substances.
	It is not clear which of the biological elements are used in the different waterbody categories	This is available on the watermaps tool ( <a href="http://www.wfdireland.ie">www.wfdireland.ie</a> ) for each waterbody

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	What specific pollutants were assessed and with what reliability?	This comment has been noted and forwarded to the EPA
	The monitoring and management of water dependent SAC's, and their catchments is pretty shambolic in the RBD	This comment has been noted and forwarded to the NPWS
	While there has been new schemes developed for classification, there appears to be a suggestion that we don't have previous information to identify trends or guide management. It is not clear how this is reflected in the view of the EPA	The new classification systems are more conservative than previous systems. The EPA has used historical data where appropriate and it was also used in the Article 5 risk assessments.
	The one-out, all-out principle is a) probably not workable and b) not happening anyhow because a full suite of biological parameters are not evaluated	The EPA is confident that the new status assignments correctly reflects the condition of our waters. Once the full suite of biological parameters have been determined, they will be included in future monitoring programmes
	How many lakes and transitional waters (the total n-value here) have been assessed for their conservation status?	There is no formal monitoring programme for conservation status for lakes or transitional waters, although assessment of some lakes have taken place, for example, Lough Carra has been preliminary assessed in 2009 and was found to be not at favorable status. A methodology has been developed for the assessment of Lagoons and many of these has been assessed with respect to their conservation status.
	There is no mention of the ongoing contamination of Galway's drinking water by Cryptosporidium. This is a prime example where the plan is not open or transparent	This comment has been noted.
	The Pearl Mussel Action Plans is a good example of probably too little too late	This comment has been noted and forwarded to the NPWS
	Page 49. This is one of the few examples where there is an acknowledgement of failure to comply with Regulations	This comment has been noted
	For open and transparent dissemination of information, all monitoring associated with Directives should be publicly available	This comment has been noted and forwarded to the EPA for consideration
	I would suggest that more than EPA guidance is needed	This comment has been noted
	The SEA should provide the joined up thinking, but will need to be a serious document, that considers alternatives and includes an adequate consultation process	These have been included in the SEA
	There is a difference between meeting the milestones, and putting in place effective policies. What evaluation process of the quality of milestones has occurred	Objectives have been established in the plan for all waters. Measures have been identified for each water body and the implementation plans are to be prepared. A WFD high level implementation group has been established by the DEHLG. Monitoring is on-going to ensure compliance with the objectives of the WFD

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Organisation	Additional Issues	Responses
SWAN W_RBMP_037	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
SWAN W_RBMP_037	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.
TEAGASC W_RBMP_017	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)
GSI W_RBMP_036	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 SW has 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.
Ken Irvine W_RBMP_008	How can you have status class for groundwater if there are no monitoring points in the western half of the RBD?	Where groundwater is not directly measured, its status is extrapolated from representative groundwater monitoring sites. Default position of "Good" is incorrect
	If there is no measurable groundwater, there is no logic to a default position of "Good"	

### 3.2.19 Basic and Supplementary Measures

Organisation	Basic and Supplementary Measures	Responses
AN TAISCE W_RBMP_033	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.
	The Draft Plan has not addressed each Supplementary measure as to how it will be carried out, nor has the	Measures have been identified for each waterbody and the implementation plans are

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Organisation	Basic and Supplementary Measures	Responses
	Draft Plan indicated which individual water body needs which particular supplementary or basic measure.	to be prepared
	The extent of risk posed by different problems varies by water body, therefore the action taken needs to be tailored to each.	
	For how long will the Basic measures be applied before it is determined that they are insufficient to meet good quality water status and Supplementary measures must be used, has not been indicated within the Draft Plan. This must be considered and discussed in the actual management plan.	The programme of measures, must be implemented by 2012
	If no use of supplementary measures is anticipated until 2015, then the Draft Plan is plainly misleading and it is disingenuous at best to invite the public to consider these options without making clear that they will not be carried out before 2015.	
	The Draft Plan also states in Step 6 that several alternative Supplementary measures may be used for any one issue, yet no analysis has been done within the Draft Plan which weighs up the costs and benefits of the different options, both economic and ecological.	Costing of wastewater and on-site system measures has been undertaken for all water management units. The plan clarifies the recent proposals on water pricing policy and also confirms that economic analysis has not been used to extend deadlines for the final plan.
	Whilst 'strengthened enforcement' is cited as a measure, there is no real indication of how this is going to be achieved. There does not appear to be any monitoring of trends or changes in enforcement, so how will it be determined that 'improved enforcement' is being achieved?	A WFD high level implementation group has been established by the DEHLG
	In relation to agriculture, one of the most significant pressures, no additional measures are proposed, (only possible measures are proposed) until the review of the Good Agricultural Practices (Nitrates) Regulations.	The agricultural catchment programme will determine the requirement for measures, however, 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
	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
<b>CENTRAL FISHERIES BOARD W_RBMP_023</b>	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
	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 Measures include for impassable barriers investigation
	The maintenance of the hydrometric network and the fisheries service is supportive of plans to upgrade the network, use of continuous flow monitoring devices and most importantly, accurately recording of low flows. The optimum ecological flow should be established for key fisheries and flows should be sufficient to sustain fish populations, maintain water quality and meet the requirements of migratory fish.	This comment has been noted and forwarded to the EPA for consideration
<b>DAFF W_RBMP_015</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.	The agricultural catchment programme will determine the requirement for measures, however, further measures for agriculture are included in the FPM sub basin plans
	Measures for High Status and Protected Areas - review controls on use and disposal of pesticides including sheep-dip	Basic measures include for controls of dangerous substances in all waters
	All RBDs - National forestry supplementary measure - reduce pesticide usage	These are included as sasures for forestry
	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 trialed
	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	

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Organisation	Basic and Supplementary Measures	Responses
	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.	out at a catchment scale to determine their effectiveness. Some further research is being undertaken under the HYDROFOR Project. The measures are a suite of measures which should be used where appropriate and silviculturally possible. Comment on the specific measures were noted and measures update.
	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.	Comment noted
	S4. A definition of peat soil type (or peaty soil) is required. The document does not define peat - peat is not a homogenous entity– some are mineralised through agricultural usage, some are cutover, some are unenclosed and not used for intensive agriculture, some support intensive agriculture, some adjoin water stretches at risk. The soils definition of an Irish peat bog is a peat layer >30cm on drained peats and > 45cm on undrained peats (Hammond, 1979) See Teagasc data set.	Definitions of peat soil type are given in the background documents to the Plan.
	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.	Comment noted
	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>	Comment noted
	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”.	Comment noted
	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.	Comment noted
	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.	Comment noted

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Organisation	Basic and Supplementary Measures	Responses
	<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>Comment noted.</p> <p>Comment noted.</p>
<b>EPA W_RBMP_050</b>	<p>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.</p> <p>Clarification on whether supplementary measures for physical modifications are required only for river waterbodies.</p> <p>Unique coding system for supplementary measures.</p>	<p>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.</p> <p>The morphology measures include marine and freshwater measures, however some are only applicable to rivers</p> <p>This has been included in the plan</p>
<b>SWAN W_RBMP_037</b>	<p>Clarify the timing for the introduction of all Supplementary Measures and the reason(s) for this.</p> <p>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.</p> <p>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?</p> <p>A list of waterbodies for which alternative objectives are being applied must be provided with justifications according to strict WFD criteria.</p>	<p>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.</p> <p>The current WSIP focuses on UWWTD requirements, further basic and requirements are considered under the WFD for protected waters and other waters</p> <p>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.</p> <p>This information is included in the plan</p>

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Organisation	Basic and Supplementary Measures	Responses
<b>Galway County Council</b> <b>W_RBMP_041</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	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
	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.	
	The scale of the cutback in the public finances means that it is not possible for Galway County Council to commit to provision of wastewater treatment plants in the locations required	
	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	These comments have been noted and will be considered in the implementation process. In relation to oswts new legislation i s proposed which will place greater emphasis on the owner/occupier of premises to maintain their wastewater treatment systems.
<b>IBEC</b> <b>W_RBMP_032</b>	IBEC supports the implementation of the most cost effective measures	These comment have been noted and will be considered in the implementation process.
	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	
	Business customers require high quality water supply as a pre-requisite component and aid to operations	
	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	

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Organisation	Basic and Supplementary Measures	Responses
<b>Clare County Council</b> W_RBMP_030	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
<b>IFA_CONNACHT</b> W_RBMP_002	The IFA Connacht wish to reject 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, which do not exceed the Nitrates requirements	The Good Agricultural Pracxtice Regulations is the measure identified in the RBMP for agriculture. Farm inspections will be carried out by the Department of Agriculture, Fisheries and Food. Should these inspections identify water pollution issues then the Local Authorities may be informed and further inspections may take place.
<b>IFA_GALWAY</b> W_RBMP_007	Galway IFA 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	The Good Agricultural Pracxtice Regulations is the measure identified in the RBMP for agriculture. Farm inspections will be carried out by the Department of Agriculture, Fisheries and Food. Should these inspections identify water pollution issues then the Local Authorities may be informed and further inspections may take place.
<b>CARRA / MASK ANGLING FEDERATION</b> W_RBMP_046	Are supplementary measures in reality going to be considered?	Supplementary measures will be considered if the basic measures are not sufficient in achieving the required ecological requirements
<b>WESTERN REGIONAL FISHERIES BOARD</b> W_RBMP_022	It is not apparent that the use of basic measures on their own will be sufficient.	A suite of Measures is included in the Plan to aid in achieving good status where necessary.
	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

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Organisation	Basic and Supplementary Measures	Responses
	The maintenance of the hydrometric network and the fisheries service is supportive of plans to upgrade the network, use of continuous flow monitoring devices and most importantly, accurately recording of low flows. The optimum ecological flow should be established for key fisheries and flows should be sufficient to sustain fish populations, maintain water quality and meet the requirements of migratory fish.	These comments have been noted and forwarded to the EPA for consideration
	Stock management initiatives by the fisheries service such as the removal or control of the roach population in Lettercraffoe lake could be termed a programme of measure for the purpose of the plan. In this regard, it is recommended that the plan make reference to fisheries specific programme of measures	Noted. Where water bodies fail on the basis of fish stock then action will be required by the relevant Fisheries to address any imbalance and restore status.
<b>Ken Irvine</b> <b>W_RBMP_008</b>	More attention is certainly required for many protected areas. It seems that there is no current provision to effect Supplementary Measures apart from for waters containing Pearl Mussel	Protected areas are the focus of basic measures and the Plan identifies the need to comply with the more stringent requirements of Protected areas as a specific objective (Objective 4).
	It is not only the Pearl Mussel that needs supplementary measures	These comments have been noted.
	It is regrettable that some of the possible supplementary measures are not already in place for sensitive catchments	
	Is there agreement from DAFF that if additional measures are needed to reduce diffuse pollution, these will be implemented	These are included as possible measures pending the findings of the agricultural catchment pilot studies. A WFD high level implementation group has been established by the DEHLG.

### 3.2.20 Extended Deadlines

Organisation	Extended Deadlines	Responses
<b>AN TAISCE</b> <b>W_RBMP_033</b>	Where derogations from the default WFD objective of Good Ecological Status are applied e.g. the extended deadline until 2027 for rivers and canals waters in the Draft Plan, insufficient information is provided on the justifications for such derogations. Again there is no economic information presented with regard to decisions made on the basis of disproportionate cost.	The decision making rationale is included in the background documents. Costing of wastewater and on-site system measures has been undertaken for all water management units. The plan confirms that economic analysis has not been used to extend deadlines for the final plan.
<b>EPA</b> <b>W_RBMP_050</b>	Provide Scientific Reasons for seeking derogations in time scale.	The decision making rationale is included in the background documents.
<b>Galway County Council</b> <b>W_RBMP_041</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.	Substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive.

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Organisation	Extended Deadlines	Responses
<b>Clare County Council</b> W_RBMP_030	The time frame specified for the implementation of actions (with projected improvement in water quality status) actions is aspirational and unrealistic	The Final Plan takes account of technical feasibility of measures implementation and recovery times resulting from measures. Deadlines and extended deadlines have now been identified for many water bodies impacted by pressures.
<b>CARRA / MASK ANGLING FEDERATION</b> W_RBMP_046	It is widely held that the actual deadline for delivery of the Directive's objectives will slip to 2021 and even as far out as 2027	The timing is dependent on technical feasibility (for example whether additional information is required) as well as estimates of recovery time resulting from measures implementation. Extended deadlines have been identified for water bodies which takes account of the realistic time frame for environmental response arising from reduced pressure. The decision making rationale are included in the background documents.
<b>CARRA MASK CORRIB WATER PROTECTION GROUP</b> W_RBMP_019	While the 2015 deadline is highlighted it is more likely that the deadlines of 2021 to 2027 are the achievable objectives Derogations while not mentioned lurk in the background	These comments have been noted. The decision making rationale are included in the background documents.
<b>Ken Irvine</b> W_RBMP_008	The targets of achieving Good Status of all but some water bodies is considered to be not achievable by 2015	The timing is dependent on technical feasibility (for example whether additional information is required) as well as estimates of recovery time resulting from measures implementation. Extended deadlines have been identified for water bodies which takes account of the realistic time frame for environmental response arising from reduced pressure. The decision making rationale are included in the background documents.

### 3.2.21 Integration with Other Plans and Programmes

Organisation	Integration with Other Plans and Programmes	Responses
<b>AN TAISCE</b> W_RBMP_033	Other than a brief mention on page 109 of the Draft Plan, there is no elaboration on how the Plan will be integrated with the Floods Directive. 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</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	These comments have been noted. The Register of Plans and Programmes Background Document to the River Basin

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Organisation	Integration with Other Plans and Programmes	Responses
<b>W_RBMP_023</b>	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.	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.
	The Lough Mask Biosecurity Plan is now being implemented in the WRBD and the NBIRBD plan should encourage the adoption of similar plans for lakes and waterbodies in the RBD. Coarse fish biosecurity planning should also be encouraged.	
<b>EPA W_RBMP_050</b>	Integration of Plan with other Plans and Programmes including County/City Dev Plans s/b mentioned.	These are included in the links to plans and programmes section of the RBMP
<b>OPW W_RBMP_045</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 activities in waters 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>IBEC W_RBMP_032</b>	All Development Plans must take account these regional guidelines	Included in links to plans and programmes section in the RBMP
	River basin objectives will only be achieved if plans and programmes are coordinated and integrated.	This is included in links to plans and programmes section in the RBMP
<b>Sligo County Council W_RBMP_027</b>	Should the RBMPs be aligned to the Drinking Water Source Protection Plans	These are included in the links to plans and programmes section of the RBMP
<b>Western Regional Fisheries Board W_RBMP_022</b>	Local Authorities as the competent authorities for the assessment of projects in SAC's should facilitate links between the Water Framework Directive and the Habitats Directive that encourage a partnership approach to implementing measures	These are included in the links to plans and programmes section of the RBMP

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	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.	This comment has been noted
<b>Western Regional Fisheries Board</b> W_RBMP_039	The Biosecurity Plan for Lough Mask should be taken into consideration in the RBMP	This is referred to in the Final Plan
<b>Ken Irvine</b> W_RBMP_008	The RBMP must link with Development Plans to be effective	This is included in links to plans and programmes section in the RBMP

### 3.2.22 Website & Water Maps

Organisation	Website & Water Maps	Responses
AN TAISCE W_RBMP_033	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.	
	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</b> W_RBMP_023	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.	

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Organisation	Website & Water Maps	Responses
	Ideally all reference (national reference sites and references for each biological element) and high status sites within each RBD should be identified on the water maps.	
	The results of SM monitoring for fish in rivers, lakes and transitional waters is published on the website www.wfdfish.ie. It is envisaged that this website will also have a web-based interactive mapping system (in 2009) to show fish status in all RBDs.	
<b>Galway County Council W_RBMP_041</b>	The interactive map available on www.wfdireland.ie is to slow for local authority needs	This comment has been noted. Watermaps has been updated
	Clarification is required in relation to the on-line mapping system. Is it envisioned that this will be used by local authorities or is it for the general public? Also, when will all the information layers be provided to the local authority?	The system is available to Local Authorities and the public. Watermaps has been updated and further GIS development will be progressed by the EPA who are the developers of EDEN.
<b>Clare County Council W_RBMP_030</b>	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.	This comment has been noted. 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
<b>CARRA / MASK ANGLING FEDERATION W_RBMP_046</b>	The watermaps and wfdireland websites are not of a high standard	This comment has been noted. Watermaps has been updated
<b>CARRA MASK CORRIB WATER PROTECTION GROUP W_RBMP_019</b>	Watermaps and the website (www.wfdireland.ie) are not user friendly, but require a high degree of prior knowledge which is assumed before one can make any sense of them	This comment has been noted. Watermaps has been updated

### 3.2.23 Waterbody Specific Issues

Organisation	Waterbody Specific Issues	Responses
<b>AN TAISCE W_RBMP_033</b>	There is a large amount of peatland forestry in the Corrib catchment..... The Corrib is not listed as at risk, nor as at diffused risk from forestry, yet this is incorrect	The catchment of Lough Corrib is very large and in this context the forestry within the catchment does not constitute a risk to Lough Corrib itself. Forest stands do not constitute a risk from their physical presence (except on acid sensitive hydrogeological settings (acid soils on acid bedrock for example). The risk arises from forestry activities such as afforestation, forest road making, felling and reestablishment which occur periodically at diverse locations throughout the catchment. The risk from these activities manifests in the

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Organisation	Waterbody Specific Issues	Responses
	Lough Mask is set to supply nearly 2/3 of the drinking water in Mayo, yet it is not listed as being a protected area under the Drinking Water Directive. The threats from abstraction have not been identified or addressed within the Draft Plan.	inflowing river catchments of Lough Corrib where smaller lakes and rivers can be impacted. Where forest stands exist on peat in such river catchments the risk exists to these water bodies. An example of this is the Owenriff river which flows through Ougheterard in Co. Galway. This river is a Freshwater Pearl Mussel river designated under the EU Habitats Directive. Forest stands account for over 19% of the land use within its catchment. This is clearly indicated as a risk in the FPM Sub Basin Management Plan for the Owenriff where measures have been identified.
<b>Galway County Council W_RBMP_041</b>	Galway County Council will not be able to deliver good status for Lough Corrib where the moderate status is as a result of an invasive alien species (Lagarosiphon major). There is every indication this weed can be controlled but not eliminated once a strong foothold has been established	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 being made available to address the issue through research and the development of action plans to both control and eradicate invasive species in Ireland. This comment will be considered under reviewed objectives in the plan.
<b>Leitrim County Council W_RBMP_016</b>	<p>WE_35_2893 Magheramore Poor status. This water body is a stream flowing south east into Glenade Lake (part of the Bonet/Garavogue). It would appear to be extrapolated from a water body identified as WE_35_1113 which is adjacent to Glencar lake. These two water bodies do not have any association. WE_35_1113 drains to the Drumcliffe River.</p> <p>WE_35_139 Glencar lake - Good Status. I am querying this status for 2 reasons, i) all river water bodies surrounding the lake have been identified as poor status and as this is the case it is difficult to understand why the lake is identified as good status. ii) In the comments on lake status the total phosphorus was recorded as moderate at 0.73mg/l with a mean TP as 18.5ug/l.</p>	These comments have been forwarded to the EPA for consideration in status assignment
<b>SWAN W_RBMP_037</b>	<p>The corrib is not listed as at risk from forestry - or even under diffuse risk. This is incorrect</p> <p>Under the Headford River risk report, how could the following 2 statements both be true? RD5a unsewered - pathogens 1a/at risk RD5b unsewered - phosphate 2b/not at risk</p> <p>Lough Ree is an SPA (and partly SAC) so why is this status not indicated in "Watermaps"</p> <p>On the Moy estuary, how can the Bathing Waters Directive not apply</p>	These comments have been considered under reviewed objectives in the plan. Lough Corrib is very large water body and for this reason it is not considered to be directly impacted by forestry, however, some river catchments within the Corrib catchment are heavily forested and a risk does exist from forestry in these instances. For example, the Owenriff catchment at Oughterard, which is also a Fresh Water Pearl Mussel catchment, has 19% of its surface catchment area under forest stands. This issue is addressed in a specific Fresh Water Pearl Mussel Catchment Plan for

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Organisation	Waterbody Specific Issues	Responses
		the Owenriff catchment which includes specific measures for forestry.
<b>RLCCC W_RBMP_001</b>	We believe that there has been a clear issue of potential pollution of ground and surface waters at Creevagh Cong, which continues, in the full knowledge of Mayo County Council, and in our minds represents a serious risk to both ground and surface waters, and hence to public health.	This comment has been noted and forwarded to the Local Authority. The matter is under investigation by both the planning and environment departments of Mayo County Council.
<b>LOUGH MASK ANGLING CLUB W_RBMP_003</b>	The present proposed designation of "Good Status" being assigned to Lough Mask is neither accurate nor acceptable, and runs counter to many other investigations and reports	These comments have been forwarded to the EPA for consideration in status assignment
<b>Sligo County Council W_RBMP_005</b>	We request that the water status in the Grange River is revised downwards to accurately reflect existing water quality conditions	These comments have been forwarded to the EPA for consideration in status assignment
<b>LAKESIDE ESTATE RESIDENTS ASSOCIATION W_RBMP_006</b>	The risk of flooding onto our residential properties arising from construction developments on the Claregalway Flood Plain	This comment has been noted and forwarded to both the Local Authority and the OPW for consideration under Floods Directive Management Plans
	The impact of flooding on water quality to our house arising from sub-standard sewage storage tanks	This comment has been noted and forwarded to the Local Authority .
<b>An Taisce Galway W_RBMP_020</b>	The potential development of a new Harbour just off of the existing Harbour Enterprise Park just below Renmore, could have significant effect on NHA's & SPA's of Inner Galway Bay if permission is ever given.	This comment has been noted and forwarded to the Local Authority
<b>Ken Irvine W_RBMP_008</b>	How can the Cong canal reach GEP when it usually doesn't have any water, at least not permanently, and doesn't function as a canal	The target for all artificial waters is GEP

**3.2.24 Editorial Issues**

Organisation	Editorial Issues	Responses
AN TAISCE W_RBMP_033		
DAFF W_RBMP_015		
DCENR W_RBMP_031		
EPA W_RBMP_050		
GSI W_RBMP_036	<p><b>ALL OF THE ORGANISATIONS and Individuals LISTED ON THIS PAGE SUBMITTED EDITORIAL COMMENTS. FOR FURTHER INFORMATION ON THESE SUBMISSIONS PLEASE CONTACT THE NS2 PROJECT OFFICE</b></p>	
Galway County Council W_RBMP_041		
Sligo County Council W_RBMP_027		
Oughterard Anglers Association W_RBMP_035		
Ken Irvine W_RBMP_008		