

# Draft River Basin Management Plan for Ireland

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

### Note:

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

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

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

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

**Section A: Respondent Profile (Optional)**

	A
<b>Name</b>	Teresa Morrissey
<b>Organisation</b>	IFA Aquaculture
<b>Email Address</b>	teresamorrissey@ifa.ie

**Please select your gender**

- Female  Other  
 Male  Prefer not to say

**Please select your age group (based on your last birthday)**

- 12 or under  45 - 54  
 13 - 18  55 - 64  
 19 - 24  65 - 74  
 25 - 34  75 and over  
 35 - 44  Prefer not to say

**County of residence (optional)**

Ireland

**Sector (Please tick the most appropriate box)**

- Government Department  Other Public Sector Body  
 Local Authority  Individual  
 Non Governmental Organisation  Other  
 Group Water

When seeking information in relation to water issues, which source(s) are you most likely consult? *(Please place an X in the relevant box or boxes)*

*at most 2 choice(s)*

- www.catchments.ie  Local Authority Waters Programme (LAWPRO)  
 EPA  An Fóram Uisce  
 Local Authority  NGO  
 Irish Water  Other  
 SWAN

**Section B: Consultation questions**

**Section 2.3 – What we want to achieve**

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

*2000 character(s) maximum*

Class A Shellfish Growing Waters that will enable us to produce top quality, safe product, that can be exported with confidence to any market in the world.

There are 64 designated shellfish areas in Ireland as part of the EU Water Framework Directive requires all Member States to designate waters that need protection in order to support shellfish life and growth. There are physical, chemical and microbiological requirements that designated shellfish waters must either comply with or try to improve, as well as the establishment of pollution reduction programmes where required. In recent years, mis-management of discharge into designated shellfish areas has compromised the water quality in shellfish producing bays across the country. The RBMP must prioritise tertiary treatment must continue to be rolled out for all coastal Wastewater Treatment plants (WWTP) - specifically WWTP's adjacent to bays and harbours where shellfish production is carried out to sustain food safety, rural jobs and enterprise and compliance with the EU Water Framework Directive.

The draft RBMP in the Aquaculture Section 5.4.14 describes 'the potential impact from finfish farming, can include impacts on water quality, biodiversity, the condition of the local habitats, risks from the use of pesticides and threats from the introduction of non-native species'

In relation to finfish aquaculture, current WFD classification of coastal waters classifies all coastal water bodies as being of 'High' status for water quality parameters - this includes water bodies which contain salmon farms and indeed all marine aquaculture activities. Almost all salmon farms in Ireland are of organic status and the location of farms, which are located in exposed, will flushed offshore environments – fish farming sites located in these environments are considered to have reduced nutrient enrichment when compared to natural levels and thus mitigates the risk of eutrophication.

### **Section 3.3 – Artificial and Heavily Modified Water Bodies**

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

*2000 character(s) maximum*

### **Section 3.4 – Impacts of Climate Change**

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

*2000 character(s) maximum*

Changes in climate resulting in increased risk of extreme rain, flooding and storminess could result in increased risk of damage to aquaculture infrastructure, wastewater infrastructure resulting increased risk of shellfish contamination, and potential risk for public health. In addition, the shellfish production industry engages with state agencies in relation to the classification of shellfish producing areas, in the past number of years there has been a marked increase in the de-classification of shellfish production areas due to increased pressure on adjacent wastewater treatment systems. The risks of climate change could further affect the classification of shellfish production areas, leading to loss of earnings, reduced access to suitable markets and inability to send shellfish product market during certain times of the year.

Currently Ireland's Wastewater Collection networks are susceptible to frequent stormwater overflows after rainfall due to rainfall infiltration of sewage collection system. This results in release of diluted sewage into estuaries without Wastewater treatment. In addition, stormwater overflows can add nitrogen and phosphorous into transitional and nearshore coastal waterbodies leading to excessive algal growth which can sometimes put further pressure on the ecosystem in which shellfish grow.

Consideration must be given to the role of the aquaculture industry as a carbon efficient source of sustainable protein. Aquaculture also contributes to the control of nitrogen/phosphorous removal shellfish are filter feeders which aids to reduce eutrophication of waters - so its welcome to see the proposed Action on 'opportunities in the monitoring programme to improve our understanding of climate change trends'

### **Section 4 – Implementation of Second Cycle Plan**

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

*2000 character(s) maximum*

Increased pressures on water systems have not been effectively managed in some respects, in particular in relation to wastewater treatments systems.

### **Section 5.3.1 – Implementation / Governance**

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

*2000 character(s) maximum*

It would be welcome if the aquaculture industry could be included in forums such as, An Foram Uisce (The Water Forum) to facilitate debate and discussion relating the views of the aquaculture industry in relation to water quality, rural water issues, issues affecting the industry as customers of Irish Water and issues relating to the implementation of the Water Framework Directive.

At present, there is no direct engagement with the aquaculture industry in relation to water quality issues, and the inclusion as a stakeholder should be considered as part of the proposed Action 'review to be undertaken of the Local Authority Waters Programme'

**Section 5.3.2 – Areas for Action**

Question 6: What are your views on the approach taken to the selection of areas for action in the draft plan?

*2000 character(s) maximum*

We welcome the proposed Action 'restoration works to be advanced in 427 areas where environmental objectives are not being met' particularly where these areas occur in coastal zones - this work must be expedited without delay to ensure environmental objectives are being met in these areas and water quality is being improved.

**Section 5.3.2 – Areas for Action and Appendix 3**

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

*2000 character(s) maximum*



### **Section 5.3.3 – Public Participation**

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

*2000 character(s) maximum*

Key stakeholders such as the aquaculture sector should be included and consulted the decision making process. As mentioned previously, inclusion of the aquaculture sector in forums such as An Foram Uisce, should be considered as part of the review of An Foram Uisce to further strengthen stakeholder engagement in the development of national policies, to ensure optimum level of engagement.



**Section 5.4.1 - Agriculture and water quality management**

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

*2000 character(s) maximum*

**Section 5.4.2 - Natural Rivers and Lakes and River Restoration – Hydromorphology**

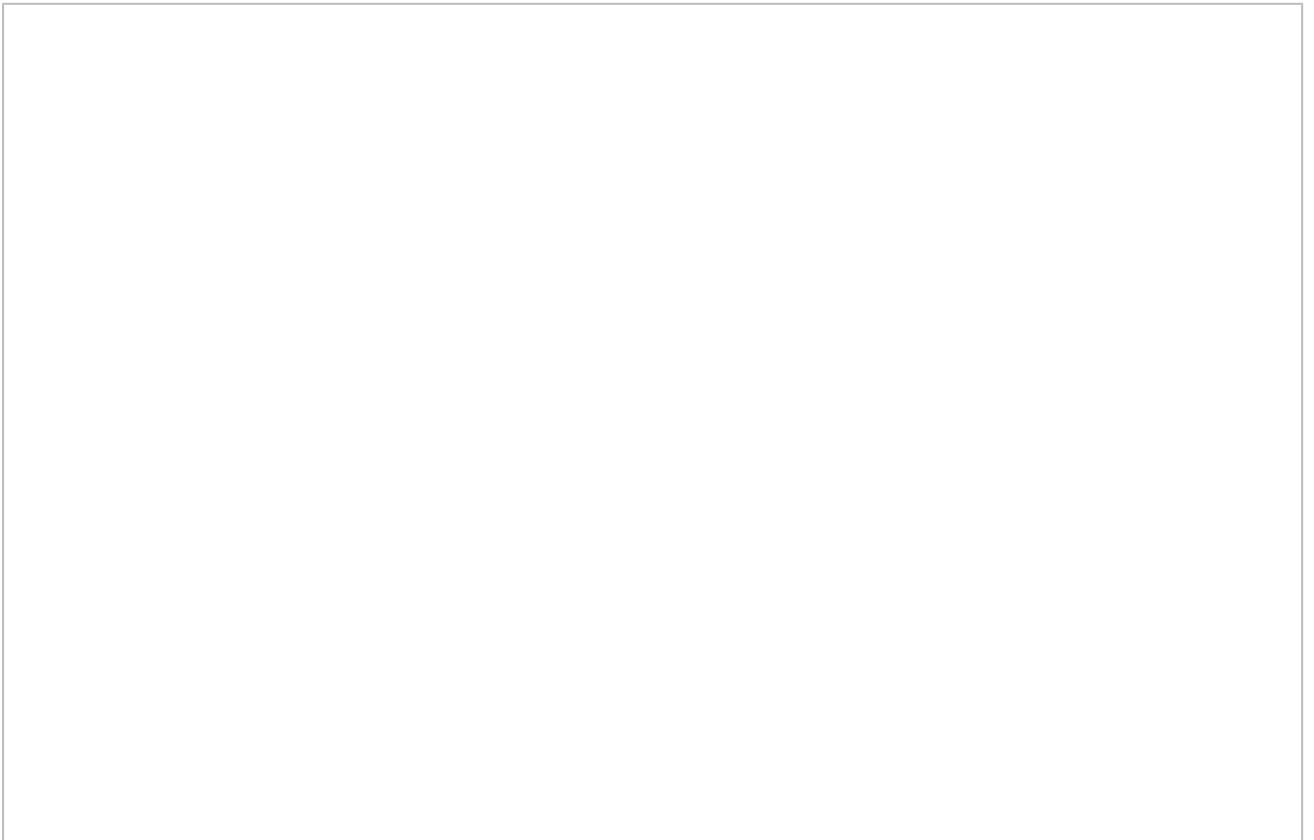
Question 10: What are your views on the development of a new Controlled Activities for the Protection of Waters regime to address pressures on the physical condition of waters?

*2000 character(s) maximum*



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

*2000 character(s) maximum*



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

*2000 character(s) maximum*

**Section 5.4.4 - Urban Waste Water**

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

*2000 character(s) maximum*

Direct discharge of nutrients from urban waste water treatment plants while elevated concentrations of bacteria and pathogens impacts shellfish water quality - There are 64 designated shellfish areas in Ireland as part of the EU Water Framework Directive requires all Member States to designate waters that need protection in order to support shellfish life and growth. There are physical, chemical and microbiological requirements that designated shellfish waters must either comply with or try to improve, as well as the establishment of pollution reduction programmes where required. In recent years, mis-management of discharge into designated shellfish areas has compromised the water quality in shellfish producing bays across the country. RBMP must prioritise tertiary treatment must continue to be rolled out for all coastal Wastewater Treatment plants (WWTP) - specifically WWTP's adjacent to bays and harbours where shellfish production is carried out to sustain food safety, rural jobs and enterprise and compliance with the EU Water Framework Directive.

#### **Section 5.4.5 - Urban Runoff Pressures**

Question 14: What are your views on the issue of urban runoff pressures and the proposed measures outlined within the draft plan?

*2000 character(s) maximum*

As mentioned previously urban run-off can impact negatively on sewage treatment. We support the proposed measures (57-71) but we need urgent action towards nature based solution to reduce the level of rainfall entering the sewage collection network.

Run off will also add additional nutrients and chemicals into areas close to shellfish production areas in transitional water bodies whereas the goal should be to dissipate rainfall into natural holding environments relieving the pressure of sewage collection systems for agglomerations and ultimately allowing for a much greater level of sewage treatment to take place at the Wastewater Treatment Plants.

### **Section 5.4.6 - Domestic Waste Water Discharges**

Question 15: What do you think are the main barriers to people accessing the grants available to upgrade domestic waste water treatment systems?

*2000 character(s) maximum*

### **Section 5.4.7 - Unknown Pressures**

Question 16: How can local communities help with the identification of significant pressures on water bodies with unknown pressures?

*2000 character(s) maximum*



### **Section 5.4.8 - Other Pressures**

Question 17: What are your views on the issue of other pressures and the proposed measures outlined within the draft plan?

*2000 character(s) maximum*

The inclusion of aquaculture in its own right is welcome but further stakeholder engagement is needed in relation to water quality issues and water management issues affecting the sector.

Aquaculture also contributes to the control of nitrogen/phosphorous removal as shellfish are filter feeders which aids to reduce and mitigate eutrophication effects of Irish coastal waters. In relation to shellfish, as filter feeders, actually increase water quality and habitat quality in Irish coastal waters. Shellfish provide a nutrient removal service through feeding which enhances bacterial denitrification, sedimentation rates, reduces turbidity as well as contributing to nutrient sequestration.

In relation to finfish aquaculture, current WFD classification of coastal waters classifies all coastal water bodies as being of 'High' status for water quality parameters - this includes water bodies which contain salmon farms and indeed all marine aquaculture activities. As part of finfish farming, excess nutrients are artificially introduced into the water column through salmon excretion, in the form of carbon, nitrogen and phosphorus. It is acknowledged that additional nutrients can disturb the natural ratios of nutrient elements in seawater and can increase the availability of nutrients for macro-algal and phytoplankton uptake, which, in turn, can lead to eutrophication. However, the loading rate of dissolved inorganic nitrogen (DIN) from salmon farms generally is relatively low when compared to the natural loading rate. Almost all salmon farms in Ireland are of organic status and the location of farms, which are located in exposed, will flushed offshore environments – fish farming sites located in these environments are considered to have reduced nutrient enrichment when compared to natural levels and thus mitigates the risk of eutrophication.

**Section 5.4.9 – Peat**

Question 18: What are your views on the proposed measures outlined within the draft plan to address the impacts of peat on water quality?

*2000 character(s) maximum*

**Section 5.4.10 - Industry, Mines and Quarries**

Question 19: What are your views on industry, mines and quarries and the proposed measures outlined within the draft plan to address their impact on water quality?

*2000 character(s) maximum*

**Section 5.4.11 - Drinking Water Source Protection**

Question 20: What needs to be considered when making recommendations on the new approach to drinking water source protection as part of the transposition of the recast Drinking Water Directive?

*2000 character(s) maximum*



### **Section 5.4.12 - Invasive Alien Species**

Question 21: What are your views on the measures proposed for tackle the issue of invasive alien species?

*2000 character(s) maximum*

All aquaculture operators conform with their licence conditions in relation to invasive species and also hold Fish Health Authorisation, which obliges all licensed aquaculture operators to have a Fish Health Management Plan which includes a biosecurity measures to be undertaken by the aquaculture operator thus mitigating the introduction of invasive species onto aquaculture sites.

### **Section 5.4.13 - Hazardous Chemicals in the Aquatic Environment**

Question 22: What are your views on the issue of hazardous chemicals and the measures outlined within the draft plan?

*2000 character(s) maximum*



#### **Section 5.4.14 – Aquaculture**

Question 23: What opportunities would you suggest to strengthen the links between the Aquaculture licensing process and the objectives of the Water Framework Directive?

*2000 character(s) maximum*

As mentioned previously, it would be welcome if the aquaculture industry could be included in forums such as, An Foram Uisce (The Water Forum) to facilitate debate and discussion relating the views of the aquaculture industry in relation to water quality, rural water issues, issues affecting the industry as customers of Irish Water and issues relating to the implementation of the Water Framework Directive. At present, there is no direct engagement with the aquaculture industry in relation to water quality issues, and the inclusion as a stakeholder should be considered as part of strengthening the links between the aquaculture industry and the objectives of the Water Framework Directive.

In relation to strengthening the links between the Aquaculture licensing process and the objectives of the Water Framework Directive - it could be considered to establish a forum for aquaculture that includes industry, EPA, Irish Water, DAFM Aquaculture licence division, Marine Institute for their WFD work, DHLGH on marine spatial planning and other relevant agencies related to marine water quality to address issues and have discussions on how best to implement the objectives of the Water Framework Directive.

It is vital that there is further engagement between DAFM Aquaculture licence division and DHLGH on marine spatial planning - the Maritime Area Planning Bill which legislatively underpins the National Marine Planning Framework does not include or legislate for fisheries or aquaculture - this is of great concern to the aquaculture sector. Aquaculture needs to be included in the appropriate legislation governing marine spatial planning and any related enforcement agencies which that legislation establishes for the fair and correct development management of water quality in the Marine space.

Question 24: What are your views on the process identified to implement a new legislative and management framework for shellfish waters in Ireland?

*2000 character(s) maximum*

From 01 January 2022 water quality for organic bivalve molluscs must comply with one of the three categories ; one of which is that the Bay must 'be of high ecological status under the Directive 2000/60/EC (Water Framework Directive)'. The reference of the draft RBMP to 'improving the protection of shellfish waters, DHLGH will seek to implement a new legislative and management framework for shellfish waters in Ireland' is of particular note in this context as assignment of high ecological status to shellfish producing waters and protection of same is vital for the long-term solution.

There are 64 designated shellfish areas in Ireland as part of the EU Water Framework Directive requires all Member States to designate waters that need protection in order to support shellfish life and growth. There are physical, chemical and microbiological requirements that designated shellfish waters must either comply with or try to improve, as well as the establishment of pollution reduction programmes where required. In recent years, mis-management of discharge into designated shellfish areas has compromised the water quality in shellfish producing bays across the country. RBMP must prioritise tertiary treatment must continue to be rolled out for all coastal Wastewater Treatment plants (WWTP) - specifically WWTP's adjaent to bays and harbours where shellfish production is carried out to sustain food safety, rural jobs and enterprise and compliance with the EU Water Framework Directive. Shellfish water protection requires to be put on a much stronger footing legislatively within the Water Framework Directive.

IFA Aquaculture welcomes the proposed Action 'to seek to implement a new legislative and management framework for shellfish waters in Ireland' - it is vital industry stakeholders are involved in this process.

#### **Section 5.4.15 - Land Use Planning**

Question 25: What are your views on the measures proposed in the draft plan to address issues relating to land use planning?

*2000 character(s) maximum*

All land use planning in close proximity to a shellfish designated water body should have regard to possible impacts on that water body.

The National Marine Planning Framework has priorities and principles that take into account land-sea interactions in relation to land use planning near or adjacent to coastal areas, however, the Maritime Area Planning Bill which legislatively underpins this framework does not include or legislate for fisheries or aquaculture - this is of great concern to the aquaculture sector. Aquaculture needs to be included in the appropriate legislation governing marine spatial planning and any related enforcement agencies which that legislation establishes.

## **Section 5.5 – Update and Review of the Economic Analysis**

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

*2000 character(s) maximum*

IFA Aquaculture would like to see a valuation of ecosystem services provided by shellfish farming in particular through nutrient removal and have it accounted for in any economic assessment of a water body. Fisheries & aquaculture worth an estimated €526 million in terms of output value from Irish waters, with carbon absorption services of 42,647,000 tonnes valued at €818.7 million - appropriate recognition must be given for the Irish aquaculture sector in its carbon sequestration services and the added value aquaculture produce provides in this regard.

Aquaculture provides for one of the most carbon efficient sources of protein, when there is an increasing demand globally for sustainable sources of protein. Consideration must be given to the role of the aquaculture industry as a carbon efficient source of sustainable protein. Aquaculture also contributes to the control of nitrogen/phosphorous removal shellfish are filter feeders which aids to reduce eutrophication of waters.

Aquaculture sector is essential in providing employment and sustaining rural coastal economies, which is vital to ensure the development and survival of these communities. Irish aquaculture directly and indirectly supports jobs in coastal communities which have positive economic impacts directly and indirectly in the local area.

Irish aquaculture also adds to the tourism economy through initiatives such as 'Taste the Atlantic: A Seafood Journey'.

## **Any further comments?**

People may also supplement their responses by attaching any relevant information, reports and/or analysis.

Concerns raised in relation to the Aquaculture industry, specifically the impact of finfish farming where the draft RBMP states on page 75; 'impacts on water quality, biodiversity, the condition of the local habitats, risks from the use of pesticides and threats from non-native introduced species'.

IFA Aquaculture regards this as inaccurate in the context of the Irish Aquaculture sector and the following should be taken into account:

- Aquaculture also contributes to the control of nitrogen/phosphorous removal as shellfish are filter feeders which aids to reduce and mitigate eutrophication effects of Irish coastal waters.
- Shellfish, as filter feeders, actually increase water quality and habitat quality in Irish coastal waters. Shellfish provide a nutrient removal service through feeding which enhances bacterial denitrification, sedimentation rates, reduces turbidity as well as contributing to nutrient sequestration.
- In relation to finfish aquaculture, current WFD classification of coastal waters classifies all coastal water bodies as being of 'High' status for water quality parameters - this includes water bodies which contain salmon farms and indeed all marine aquaculture activities.
- As part of finfish farming, excess nutrients are artificially introduced into the water column through salmon excretion, in the form of carbon, nitrogen and phosphorus. It is acknowledged that additional nutrients can disturb the natural ratios of nutrient elements in seawater and can increase the availability of nutrients for macro-algal and phytoplankton uptake, which, in turn, can lead to eutrophication. However, the loading rate of dissolved inorganic nitrogen (DIN) from salmon farms generally is relatively low when compared to the natural loading rate (Wang et al., 2012).
- Almost all salmon farms in Ireland are of organic status and the location of farms, which are located in exposed, well flushed offshore environments – fish farming sites located in these environments are considered to have reduced nutrient enrichment when compared to natural levels and thus mitigates the risk of eutrophication (SAMS & Napier University, 2002 ; Wilding & Hughes, 2010 )

Further, as well as the Water Framework Directive 2000/60/EC, the Aquaculture sector complies with obligations outlined in a number of environmental laws such as; Habitats Directive 92/43/EEC, Birds Directive 2009/147/EC, Consolidated Environmental Impact Assessment Directive 2014/52/EU; and under the current aquaculture licensing system, the aquaculture sector is required to comply with more environmental legislation than any other sector in the marine space, thereby ensuring the healthy and sustainable use of Ireland's seas:

Residues Monitoring – EU Residues Directive 96/23 ensures animal products pose no threat to consumers – MI, SFPA, FSAI & DAFM

Benthic Monitoring – Annual Benthic Monitoring survey in accordance with DAFM Protocols assess undue impact on the seafloor – MI & DAFM

Water Quality Monitoring – Water Framework Directive & DAFM Water Column Monitoring Protocol

Sea Lice Monitoring - regular inspections of sea lice levels on all fish farms in Ireland by MI in accordance with DAFM Sea Lice Monitoring Protocol & Strategy

## **Section C: Submission discretion**

### **Submission confidentiality**

We will treat your information in line with data protection laws and policies when we are analysing and publishing the results of this consultation. Overall results that are given by individuals will be anonymous, that is, it will not be possible for you to be identified in the final report.

All submissions and comments submitted to the Department for this purpose are subject to release under the Freedom of Information (FOI) Act 2014 and the European Communities (Access to Information on the Environment) Regulations 2007- 2014. Submissions are also subject to Data Protection legislation.

Personal, confidential or commercially sensitive information should not be included in your submission and it will be presumed that all information contained in your submission is releasable under the Freedom of Information Act 2014.

## **Contact**

[Contact Form](#)